



LAKE CHARLES CITY COURT FOR THE CITY OF LAKE CHARLES

95-048

STATE OF LOUISIANA

NO. 25-775

DIVISION " "

U.S. AGENCIES CASUALTY INSURANCE COMPANY, INC.  
and REGINALD EAGLIN

VERSUS

FORD MOTOR COMPANY

FILED: 4/16/05

DEPUTY CLERK

PETITION FOR DAMAGES

The Petition of U.S. Agencies Casualty Insurance Company, Inc., and [REDACTED] a person of the full age of majority and a resident of the Parish of Calcasieu, State of Louisiana, respectfully represents:

I.

Made defendant herein is:

Ford Motor Company, a foreign company authorized to do and doing business in the State of Louisiana.

II.

Defendant is justly and truly indebted unto the petitioners, in a full and true sum reasonable under the circumstances for their damages, together with legal interest thereon from the date of judicial demand until paid, and for all costs of these proceedings, and for the following, to wit:

III.

On or about January 9, 2005, plaintiff, [REDACTED] was asleep in his home when suddenly and without warning his wife heard a loud explosion, looked out the window, and noticed that his 1995 Ford F-150, which was manufactured by the Ford Motor Company, was engulfed in flames.

IV.

As a result of the afore-mentioned incident [REDACTED] vehicle sustained extensive property damages.

ER25-005-LC-8381

X.

Ford Motor Company knew or should have known of the design characteristics and dangers thereof, of the cruise control module, when it left Ford Motor Company's control; Ford Motor Company was also aware of alternative design options for the cruise control module that would not spontaneously immobilize during use and such alternate designs were entirely feasible from both safety and economic viewpoints.

XI.

At all material times hereto, U.S. Agencies Casualty Insurance Company, Inc., had issued to [REDACTED] a policy of automobile liability insurance providing collision and comprehensive coverage as well as uninsured/underinsured motorist coverage to [REDACTED] 1995 Ford F-150 and 1997 Pontiac Grand Am SE, all of which were in full force and effect at the time of the subject accident.

XII.

As a result of the aforementioned accident that caused extensive damage to the 1995 Ford F-150 [REDACTED] paid a \$500.00 deductible to his automobile insurer, U.S. Agencies Casualty Insurance Company, Inc., which in turn paid \$4,312.00 for [REDACTED] damaged 1995 Ford F-150.

XIII.

Also as a result of the aforementioned accident, extensive damage was caused to Plaintiff's wife's 1997 Pontiac Grand Am SE. [REDACTED] paid a \$500.00 deductible to his automobile insurer, U.S. Agencies Casualty Insurance Company, Inc., which in turn paid \$2,562.00 for [REDACTED] damaged 1997 Pontiac Grand Am SE.

Plaintiffs also incurred yet-to-be-finalized salvage expenses. Plaintiffs are seeking a total of \$7,874.00 in this subrogation claim plus salvage costs, as well as interest, attorney's fees and costs, thus a jury is not required.

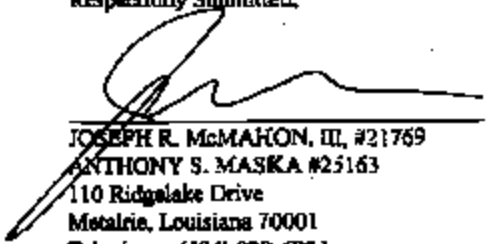
XIV.

Petitioners are entitled to judgment against Ford Motor Company, in solido, for all damages to [REDACTED] which U.S. Agencies Casualty Insurance Company, Inc., paid to its insured in addition to all further legal and equitable relief as the Court should deem necessary and proper.

**WHEREFORE**, plaintiffs pray that the defendants be duly cited to appear and answer this

petition and after all legal delays and due proceedings had, that there be judgment rendered herein in favor of the plaintiffs, [REDACTED] and U.S. Agencies Casualty Insurance Company, Inc., and against the defendant, Ford Motor Company, in a full and true sum reasonable under the circumstances for damages, together with legal interest thereon from the date of judicial demand, until paid, and for all costs of these proceedings and all general and equitable relief required or necessary in the premises.

Respectfully Submitted,



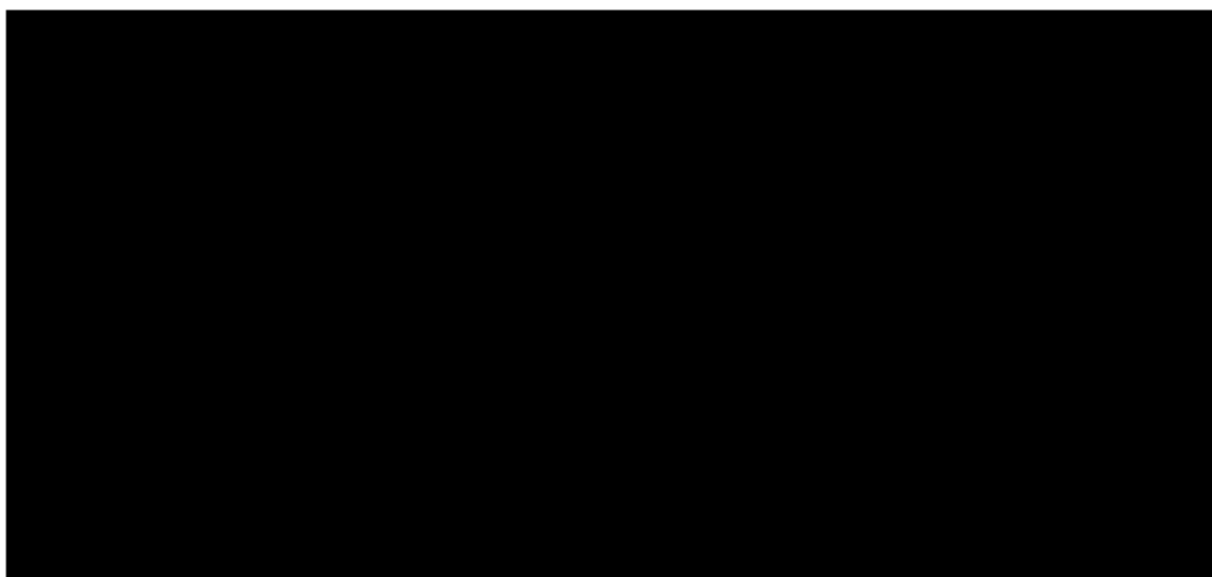
JOSEPH R. McMAHON, III, #21769  
ANTHONY S. MASKA #25163  
110 Ridgeway Drive  
Metairie, Louisiana 70001  
Telephone: (504) 828-6223  
Facsimile: (504) 828-6201  
Counsel for U.S. Agencies Casualty  
Insurance Company, Inc. and Reginald  
Eaglin

**PLEASE SERVE:**

Ford Motor Company  
Through registered agent:  
CT Corporation System  
8550 United Plaza Blvd.  
Baton Rouge, LA 70809

A TRUE COPY  
Date 4/15/85  
ACP  
Deputy Clerk

ERG5-005-LC-8383



# HUSSER & CROMARTE, L.L.C.

Attorneys at Law  
(A limited liability company of professional corporations)

P.O. Box 1627  
401 Broad Street, Suite 300  
Rome, Georgia 30102-1627

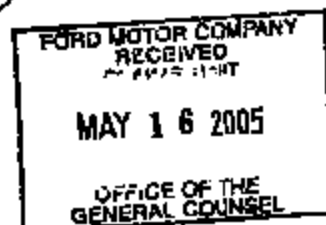
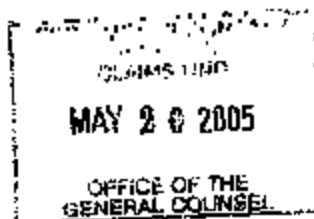
John S. Husser, P.C.  
email: jhusser@bellsouth.net

(706) 802-0251 Telephone  
(706) 802-0252 Facsimile

May 10, 2005

## CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ford Motor Company  
Attn: Legal Department  
One American Road  
Dearborn, Michigan 48126



Re: Letter of Representation and Notice of Claim  
Our Clients: [REDACTED]  
Wesley & Amy Grindstaff  
Vehicle: 2002 Ford F150 Lariat Pickup Truck (4-door)  
VIN: 1FTRW08L02K [REDACTED]  
Date of Loss: November 26, 2004

Gentlemen:

Please be advised that the undersigned has been retained by [REDACTED] relative to all matters arising out of that certain fire loss which occurred in Cedartown, Polk County, Georgia, on or about November 26, 2004.

The above-described incident occurred at approximately 4:00 a.m. at the [REDACTED] residence located at [REDACTED] Cedartown, Polk County, Georgia. The residence was a 1250 sq. foot single family dwelling with attached carport which was being leased by Folsoms from its owners, the Grindstaffs.

As a result of the fire, the dwelling and attached carport, all of the contents thereof and the Folsoms' two (2) vehicles, which were parked in the carport, to wit: a 1998

Ford Motor Company  
Attn: Legal Department  
May 10, 2005  
Page Two

Honda Accord and the subject 2002 Ford F150 Lariat pickup truck, referenced above, were completely destroyed.

Please find enclosed herewith the following:

**Exhibit "A."** A copy of the file obtained from the Enforcement Division of the *State of Georgia Office of Insurance and Safety Fire Commissioner* regarding the fire loss indicating that the fire originated in the subject 2002 Ford F150 Lariat pickup truck, referenced above.

**Exhibit "B."** Copies of twenty-five (25) 4" x 6" photographs, numbered Photographs No. 1 through No. 25, depicting the fire damage to the subject house, its contents and the two vehicles.

**Exhibit "C."** An estimate provided by Greg Roberson Construction Company to [REDACTED] in the amount of \$136,640.00 to replace the subject house. [REDACTED] received \$79,000.00 from their homeowner's insurance carrier, Georgia Farm Bureau Insurance Company.

**Exhibit "D."** An itemization with estimated fair market values of the personal property and other items belonging to the [REDACTED] which were destroyed or damaged in the fire totaling \$43,709.00.

In addition, the [REDACTED] incurred approximately \$2,000.00 uninsured loss resulting from the destruction of the 1998 Honda Accord and approximately \$2,240.00 uninsured loss resulting from the destruction of the 2002 Ford F150 Lariat pickup truck. The [REDACTED] received a total of \$27,890.00 from their automobile liability insurance carrier, Georgia Farm Bureau Insurance Company, for the loss of their two vehicles, to-wit: \$6,340.00 for the 1998 Honda Accord and \$21,550.00 for the 2002 Ford F150 Lariat pickup truck.

It is our contention that a defect, mostly likely a defective cruise control switch, in

Ford Motor Company  
Attn: Legal Department  
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the subject 2002 Ford *F150 Lariat* pickup truck proximately caused all of the losses and damages set forth above.

The subject 2002 Ford *F150 Lariat* pickup truck has been preserved and will be made available for inspection at your request at a mutually convenient time and place.

Request is hereby made that this letter of representation and notice of claim be directed to the appropriate individual and that the undersigned be contacted relative to this matter at the earliest possible date.

Thank you for your anticipated cooperation and attention to this matter.

Very truly yours,

JOHN S. HUSSEY, P.C.



John S. Hussey

JSH:cc

Enclosures: As indicated above

cc: *National Highway Traffic Safety Administration* w/Enclosures

[REDACTED] w/o Enclosures

[REDACTED] w/o Enclosures



## All Action Details for Issue

Print

VIN: 1FMRU17L51	Year: 2001	Model: EXPEDITION	Case: 1488710875
Name:	Owner Status: Subsequent	WSD: 2001-03-31	
Symptom Desc: FIRE/SMOKE SMOKE UNDERHOOD		Primary Phone:	
Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMENT		Secondary Phone:	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: ADVISE CUSTOMER TO CONTACT THEIR INSURANCE COMPANY FOR ASSISTANCE

Dealer:

Origin Desc: US CONCERN CASE BASE

Odometer: 45000 MI

Comm Type: PHONE

Analyst Name: MARGARET ARSENAULT

Analyst: MARSENAU

Action Date: 03/08/2005

Action Time: 13.01.10.598

Action Date: No

Comments CUSTOMER SAID: MARCH 7, 2005 ENGINE STARTED TO SMOKE UNDERHOOD. COMING FROM AREA OF CRUISE CONTROL. FIRE DEPT REPORT FILED IN NUECES COUNTY. INSURANCE COMPANY CLAIM FILED. INSURANCE COMPANY WILL CALL CUST BACK WITH FURTHER INFORMATION. VEH IS REPAIRABLE. VEH WAS NOT RUNNING WHEN FIRE STARTED. CUST HEARD THERE WAS A RECALL. CUST TOOK VEH INTO PADRE DULISHP AND ADVISED VEH WAS NOT UNDER RECALL. CUST HAS TO PAY \$500. DEDUCTIBLE. CRC ADVISED: YOUR INSURANCE COMPANY HAS THE RIGHT TO PURSUE CLAIMS FOR REIMBURSEMENT AGAINST FORD. IF THEY DO PURSUE A CLAIM AGAINST FORD REIMBURSEMENT OF THE DEDUCTIBLE WILL BE BETWEEN THE CUSTOMER AND THEIR INSURANCE COMPANY.

E985-005-LC-0307

4/12/2005

## All Action Details for Issue

Print

VIN: 1FMRU17L511 [REDACTED] Year: 2001 Model: EXPEDITION Case: 1753411351  
Name: [REDACTED] Owner Status: Original WSD: 2001-03-31  
Symptom Desc: Primary Phone: [REDACTED]  
Reason Desc: ICCD - CUSTOMER INFORMATION ONLY Secondary Phone:  
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: ICCD INFORMATION ONLY, NO ACTION REQUIRED

Dealer:

Origin Desc: ICCD

Odometer: 1400 MI

Comm Type: PHONE

Analyst Name: MANI JALILVAND

Analyst: M/JALIL

Action Date: 05/15/2001

Action Time: 20:55:23.184

Action Date: Yes

Comments CUSTOMER SAYS: THE CUSTOMER IS SATISFIED WITH THE VEHICLE AND HAS NO CONCERNS. PER  
CUSTOMER, DEALER SAYS: NONE CAC ADVISED. ICCD SURVEY CONDUCTED ON MAY 15.01 AT 8:53 PM.

Data Element Name

Data Value

CUSTOMER TO SERVICE LATER? (Y/N)

N

IF YES, SPECIFY TIME FRAME

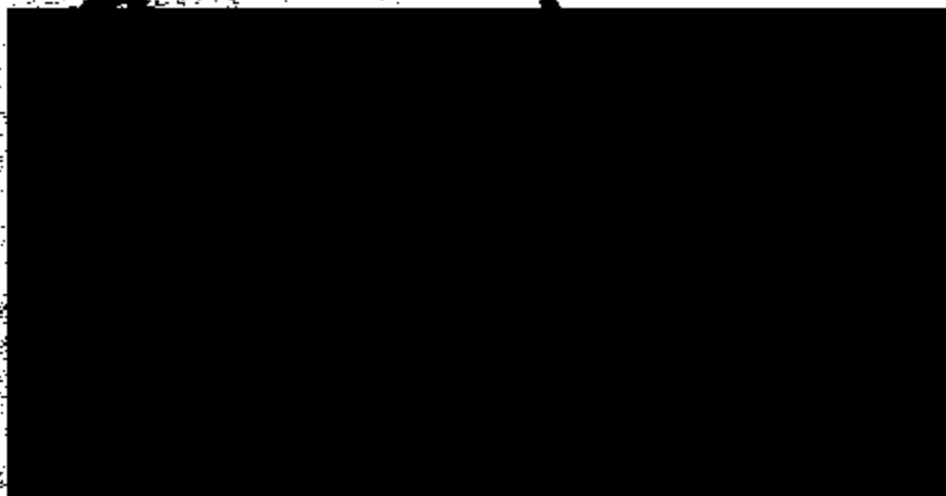
N

CUSTOMER TO CONTACT DEALER (Y/N)

N

EPR-001-LC-0308

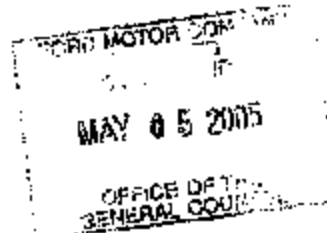
4/12/2005





FARMERS

National Document Center  
P.O. Box 268992  
Oklahoma City, OK 73126-8992  
claimsdocument@farmersinsurance.com  
Fax: 877-217-1389



*Handwritten signature/initials*

04/25/2005

Ford Motor Company  
Attn: Shawn Norton  
Park Lane Towers West, Ste. 300  
Three Park Lane Blvd.  
Dearborn, MI 48126-2568

Re: Our Insured: [REDACTED]  
Loss Date: 04/20/2005  
Claim Number: [REDACTED]  
Total Amount Owed: Pending - \$2,383.54 Currently with Future Payment Expected

Dear Ms. Norton,

A review of the facts of the above loss indicates that your product failed and caused damage to our insured's property. We have made payment to our insured for these damages, and now seek reimbursement from you. **WE RESPECTFULLY ASK THAT YOU NOT RESPOND TO OUR REQUEST WITH A FORM LETTER.**

The entities in the stream of commerce, such as you, a manufacturer, are liable in both negligence and product liability. As you know, your obligation is to properly design and test, manufacture, and give appropriate instructions for installation and use of your product.

The loss occurred when the 1997 Ford F-150 pickup, VIN 1FTDX07W3VR [REDACTED] was parked under the carport and caught on fire damaging our insured's home. The vehicle was turned off and parked for the night and fire started in the engine compartment possibly from the cruise control deactivation switch.

Your product did not meet the expectations of my insured, the consumer. Your product failed and caused the loss resulting in damages of \$2,383.54 so far with future payments expected.

It is our desire to settle this claim without causing you the additional time and cost of litigation or arbitration. Please call me to discuss resolving this matter.

Sincerely,  
Texas Farmers Insurance Company

*Michael Ray*

Michael Ray

Property Subrogation Representative  
512-238-5758

ENCLOSURES

cc: By Fax to (313) 845-4089

Last Handling Date/  
Issue Status

4/20/2005  
CLOSED

Name/  
Reason Desc

LUBERT J GULLORY  
LEGAL - ACCIDENT / FIRE

**ISSUE LIST**

Vin/  
Case No.

1FTDX07W3V [REDACTED]  
396161105

Model Year and Vehicle Line

1997 F-SERIES

Issue Type

10

EP03-005-LC-0311

## All Action Details for Issue

Print

VIN: 1FTDX07W3VK [REDACTED] Year: 1997 Model: F-SERIES Case: 396161105  
Name: [REDACTED] Owner Status: Subsequent WSD: 1996-04-09  
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD Primary Phone: [REDACTED]  
Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone: [REDACTED]  
Issue Type: 10 OGC Issue Status: CLOSED

Action: CONTACT ADVANCED TO OGC

Dealer: 04413 KINSEL FORD, INC.

Origin Desc: US CONCERN CASE BASE

Odometer: 110000 MI

Comm Type: PHONE

Analyst Name: ROBINSON ANITA

Analyst: AROBIN65

Action Date: 04/20/2005

Action Time: 10:58:40.528

Action Data: No

## Caller Information If Different From Vehicle Owner:

First Name

Middle Initial

Last Name

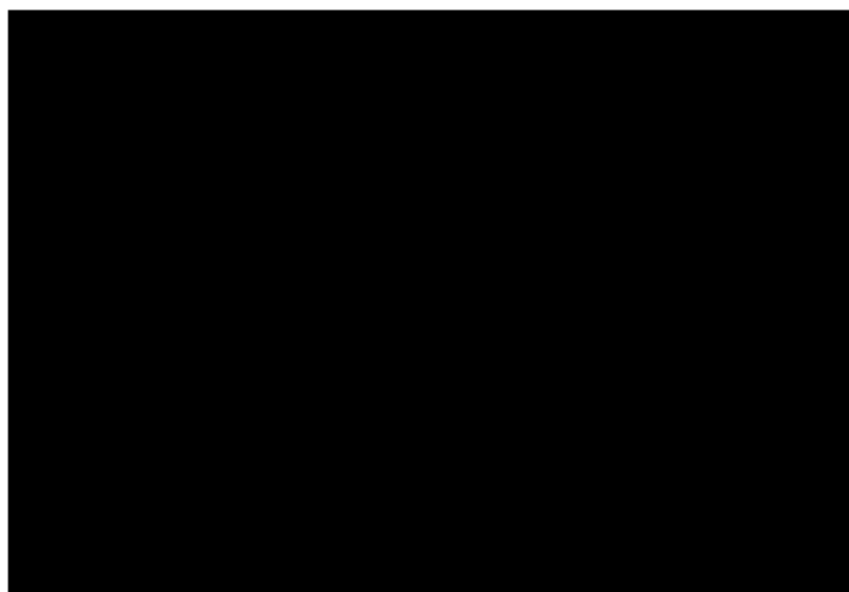
Day Phone

Relationship

CHILD

Comments CUSTOMER SAID: FIRE DATE: APRIL 20,05 LOCATION: AT CUST HOME FIRE REPORT HAS BEEN FILED AS THEY CAME TO PUT OUT THE FIRE INJURIES: NONE FIRE DAMAGED THE SIDE OF THE HOUSE AND THE VEH HAS BURNT BEYOND REPAIR HAS NOT CONTACTED HER INS COMPANY YET=CUST HAS RECD A LETTER ABOUT FORD VEHs CATCHING FROM ORIGINATING FROM UNDER THE HOOD=THIS HAS HAPPENED TO HER VEH=CUST WANTS TO KNOW IF THIS RECALL APPLIES TO HER VEH AND WHAT ACTION FORD IS GOING TO TAKE WITH HER SITUATION=DEALER SAID: NONE CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.

EPM5-005-LO-0312





## ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
5/10/2005 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMRU178XW [REDACTED] 535522324	1998 EXPEDITION	10
5/10/2005 CLOSED	[REDACTED] RECALL/ONP - VEHICLE INVOLVEMENT	1FMRU178XW [REDACTED] 535522324	1998 EXPEDITION	02
1/26/2006 CLOSED	[REDACTED] AWA - CAC SUPPORTS FIELD'S DECISION	1FMRU178XW [REDACTED] 535522324	1998 EXPEDITION	02
8/20/2004 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FMRU178XW [REDACTED] 535522324	1998 EXPEDITION	07

EP05-005-LC-0328

## All Action Details for Issue

Print

VIN: 1FMRU176XW	Year: 1998	Model: EXPEDITION	Case: 535522324
Name:	Owner Status: Subsequent	WSD: 1998-04-24	
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD		Primary Phone:	
Reason Desc: LEGAL - ACCIDENT / FIRE		Secondary Phone:	
Issue Type: 10 OGC	Issue Status: CLOSED		

Action: CONTACT ADVANCED TO OGC

Dealer: 04687 HELPMAN FORD INC

Odometer: 100000 MI

Analyst Name: GREAVES JOVANIE

Action Date: 05/10/2005

Comm Type: PHONE

Analyst: JGREAVE4

Action Time: 14.51.58.528

Origin Desc: US CONCERN CASE BASE

Action Data: No

Comments CUSTOMER SAID: VEH CAUGHT ON FIRE IN AUG. 2004 (PLS SEE HISTORY)- VEH WAS PARKED IN GARAGE AND WAS OUT OF TOWN ON A TRIP- WAS CONTACTED BY FIRE DEPT, REPORT INDICATED THE FIRE STARTED FROM THE VEH.... - HAVE NEVER HEARD FROM ANYONE AT FORD ABOUT THIS ISSUE- AN INSPECTOR FROM FORD DID COME OUT, TOOK OUT THE CRUISE CONTROL TO CHECK IT.... HAVE NOT HEARD FROM ANYONE SINCE- HAVE NEVER RECEIVED A RESPONSE FROM FORD ABOUT THIS FIRE INCIDENT- WOULD LIKE TO KNOW IF THERE ARE ANY RECALLS ON VEH.... - AT TIME OF ACCIDENT, WAS LIVING AT A DIFFERENT ADDRESS... - ALSO, THE FIRE OCCURRED AT SISTER'S HOUSE, THE VEH WAS PARKED IN HER GARAGE AND THERE WAS EXTENSIVE DAMAGE- WILL FORD BE TAKING RESPONSIBILITY FOR THIS ISSUE- IT IS ALL OVER THE NEWS THAT FORD HAD EXTENDED A RECALL FOR SAME ISSUE ON SOME OF THEIR VEHSDALER SAID: HELPMAN FORD INC.12220 SOUTHWEST FREEWAYSTAFFORD, TX 77477TEL: (281) 240-3673CRC ADVISED: I WILL FORWARD THIS INFORMATION TO THE FORD OGC DEPARTMENT. YOU WILL BE CONTACTED WITHIN 3-5 BUSINESS DAYS.++++ PLS NOTE: DO SEE THE PREVIOUS CONTACT BUT CUST IS NOW STATING DAMAGE CAUSED TO THE GARAGE BECAUSE OF THE FIRE....- ALSO, CUST STATES SHE HAS NEVER RECEIVED ANY TYPE OF RESPONSE FROM FORD.... THERE WAS AN ADDRESS CHANGE DURING THE SAME TIME PERIOD... POSSIBLE THE LETTER SENT TO A PREVIOUS ADDRESS- THEREFORE, AS PER LINC RESOURCE REP JACKIE KELLY, WAS ADVISED TO RE-OPEN THE CASE .....

E9805-0025-LC-0320

## All Action Details for Issue

Print

VIN: 1FMRU176XW1 Year: 1998 Model: EXPEDITION Case: 53552324  
Name: Owner Status: Subsequent WSD: 1998-04-24  
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD Primary Phone:  
Reason Desc: RECALL/ONP - VEHICLE INVOLVEMENT Secondary Phone:  
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: ADVISE CUST NO FSA'S AT THIS TIME

Dealer: 04587 HELFMAN FORD INC

Origin Desc: US INQUIRY CASE BASE

Odometer: 1 MI

Comm Type: PHONE

Analyst Name: PHENGPHET DARAPHONE

Analyst: DPENGPH

Action Date: 01/28/2005

Action Time: 13:47:40.452

Action Data: No

## Caller Information If Different From Vehicle Owner:

First Name

Middle Initial

Last Name

Day Phone

Relationship

FAMILY

Comments CUSTOMER SAID: CALLING TO FILE A CLAIM AS MY SISTER'S VEH CAUGHT ON FIRE IN MY GARAGE AND BURNED MY HOUSE DOWN ON 8/14/04. FIRE STARTED UNDERHOOD. I LOST EVERYTHING. THINK IT'S RELATED TO THE SPEED CONTROL RECALL I SAW ON TV. I WANT TO FILE MY OWN CLAIM SINCE FORD DIDNT DO ANYTHING ABOUT IT BEFORE. VEH IS TOTALLED. DONT KNOW WHERE MY SISTER IS RIGHT NOW SO I CANT TALK TO HER. WILL CONTACT MY LAWYER BECAUSE THIS IS THE SAME CONCERN AS THE OTHER RECALLED EXPEDITIONS. DEALER SAID: HELFMAN FORD INC. 2220 SOUTHWEST FREEWAY STAFFORD, TX 77477 TEL: (281) 240-3673 CRC ADVISED: VEHICLE IS NOT INVOLVED IN ANY RECALL/CSP AT THIS TIME. RECALLS ARE VIN SPECIFIC.

Action: ADVISE CUST NO FSA'S AT THIS TIME

Dealer: 04587 HELFMAN FORD INC

Origin Desc: US INQUIRY CASE BASE

Odometer: 100000 MI

Comm Type: PHONE

Analyst Name: GREAVES JOVANE

Analyst: JGREAVE4

Action Date: 05/10/2005

Action Time: 14:46:18.391

Action Data: No

Comments CUSTOMER SAID: - VEH CAUGHT ON FIRE IN AUG. 2004 (PLS SEE HISTORY)- VEH WAS PARKED IN GARAGE AND WAS OUT OF TOWN ON A TRIP- WAS CONTACTED BY FIRE DEPT, REPORT INDICATED THE FIRE STARTED FROM THE VEH..... THERE WAS EXTENSIVE DAMAGE TO THE GARAGE....- HAVE NEVER HEARD FROM ANYONE AT FORD ABOUT THIS ISSUE- AN INSPECTOR FROM FORD DID COME OUT, TOOK OUT THE CRUISE CONTROL TO CHECK IT..... HAVE NOT HEARD FROM ANYONE SINCE- HAVE NEVER RECEIVED A RESPONSE FROM FORD ABOUT THIS FIRE INCIDENT- WOULD LIKE TO KNOW IF THERE ARE ANY RECALLS ON VEH..... DEALER SAID: HELFMAN FORD INC. 12220 SOUTHWEST FREEWAY STAFFORD, TX 77477 TEL: (281) 240-3673 CRC ADVISED: VEHICLE IS NOT INVOLVED IN ANY RECALL/CSP AT THIS TIME

EPOS-015-LC-0338

## All Action Details for Issue

Print

VIN: 1FMRU178XW [REDACTED] Year: 1998 Model: EXPEDITION Case: 535522324  
Name: [REDACTED] Owner Status: Subsequent WSD: 1998-04-24  
Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD Primary Phone: [REDACTED]  
Reason Desc: AWA - CAC SUPPORTS FIELD'S DECISION Secondary Phone: [REDACTED]  
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: CB-SUPPORT DEALERSHIP'S/REGION'S POSITION  
Dealer: 04587 HELPMAN FORD INC Origin Desc: US CONCERN CASE BASE  
Odometer: 1 MI Comm Type: PHONE  
Analyst Name: PHENGPHET DARAPHONE Analyst: DPHENGPH  
Action Date: 01/28/2005 Action Time: 13.45.58.377 Action Data: No

## Caller Information if Different From Vehicle Owner:

First Name	Middle Initial	Last Name	Day Phone	Relationship
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	FAMILY

Comments CUSTOMER SAID: CALLING TO FILE A CLAIM AS MY SISTER'S VEH CALIGHT ON FIRE IN MY GARAGE AND BURNED MY HOUSE DOWN ON 8/14/04. FIRE STARTED UNDERHOOD. I LOST EVERYTHING. THINK IT'S RELATED TO THE SPEED CONTROL RECALL I SAW ON TV. I WANT TO FILE MY OWN CLAIM SINCE FORD DIDN'T DO ANYTHING ABOUT IT BEFORE. VEH IS TOTALLED. DONT KNOW WHERE MY SISTER IS RIGHT NOW SO I CANT TALK TO HER. WILL CONTACT MY LAWYER BECAUSE THIS IS THE SAME CONCERN AS THE OTHER RECALLED EXPEDITIONS. DEALER SAID: HELPMAN FORD INC. 2220 BOUTHWEST FREEWAY STAFFORD, TX 77477 TEL: (281) 240-3873. CRC ADVISED: THANK YOU FOR CONTACTING FORD MOTOR COMPANY IN REGARDS TO THIS ISSUE. OUR RECORDS INDICATE THAT A DECISION HAS BEEN MADE AND THE CRC CAN NOT OVERTURN THIS DECISION. HOWEVER, TO ENSURE OUR RECORDS ARE COMPLETE WE HAVE DOCUMENTED YOUR FEEDBACK. (NOTE TO CSR: SUPPORT OLV/REGION DECISION.) NO RELATED RECALLS/CSPS. PREV HISTORICALS / LEGAL DPT: 08/20/04: "LPA WILL SEND DENIAL, BEYOND WARRANTY, NO OPEN RECALLS."

ER05-025-LD-0331

## All Action Details for Issue

Print

VIN: 1FMRU178XW1 Year: 1998 Model: EXPEDITION Case: 535522324  
 Name: Owner Status: Subsequent WSD: 1998-04-24  
 Symptom Desc: FIRE/SMOKE SMOKE UNDERHOOD Primary Phone: 97  
 Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone:  
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS  
 Dealer: 04587 HELFMAN FORD INC Origin Desc: US CONCERN CASE BASE  
 Odometer: 100000 MI Comm Type: PHONE  
 Analyst Name: VASSAL PERSIS Analyst: PVASSALI  
 Action Date: 08/19/2004 Action Time: 14.52.32.222 Action Data: Yes

Comments CUSTOMER SAID: - VEH CAUGHT ON FIRE 8/14/04- FIRE ORIGINATED FROM UNDER THE HOOD- A FIRE REPORT WAS FILED - INSURANCE COMPANY HAS NOT BEEN CONTACTED- VEH IS NON REPAIRABLE- WOULD LIKE TO KNOW IF THERE IS ANY RECALLS ON THE VEH DEALER SAID: - NONE CRC ADVISED: - I WILL FORWARD THIS INFORMATION TO OUR CONSUMER AFFAIRS GROUP. SOMEBODY FROM CONSUMER AFFAIRS WILL CONTACT YOU IN 2 BUSINESS DAYS. PLEASE NOTIFY YOUR INSURANCE CARRIER AND REPORT THIS INCIDENT. - CUST WAS ADVISED THAT THERE IS NO OPEN RECALL/CSP ON THE VEH

Data Element Name	Data Value
FIRE/ACCIDENT	F

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER  
 Dealer: 04587 HELFMAN FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
 Odometer: 100000 MI Comm Type: MAIL  
 Analyst Name: FONSECA, LOURDES Analyst: LFONSECA  
 NEARON (L.C.)  
 Action Date: 08/20/2004 Action Time: 13.38.33.082 Action Data: Yes

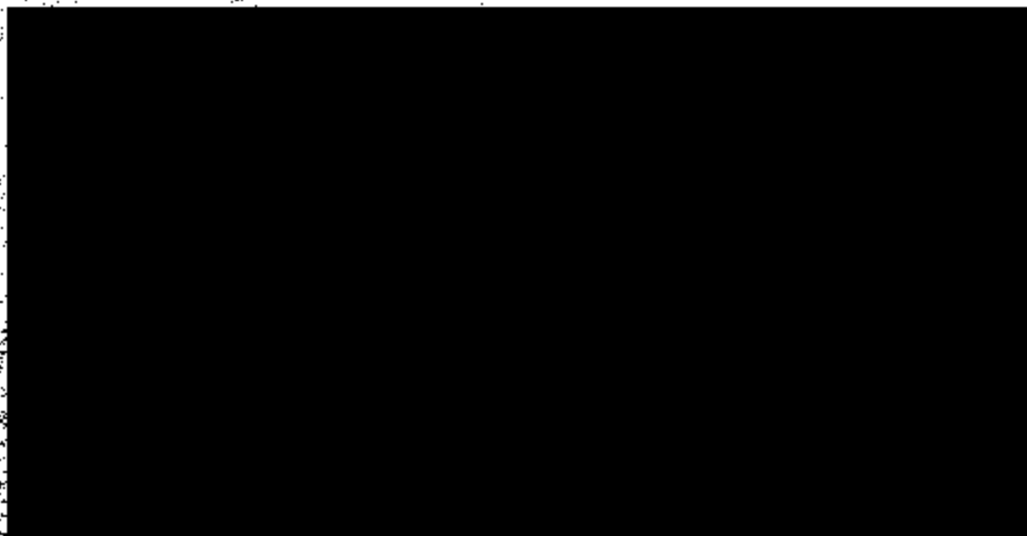
Comments LPA WILL SEND DENIAL, BEYOND WARRANTY, NO OPEN RECALLS.

Data Element Name	Data Value
CERTIFIED LETTER #	US MAIL

Action: DENY ASSISTANCE - BEYOND WARRANTY  
 Dealer: 04587 HELFMAN FORD INC Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
 Odometer: 100000 MI Comm Type: MAIL  
 Analyst Name: FONSECA, LOURDES Analyst: LFONSECA  
 NEARON (L.C.)  
 Action Date: 08/20/2004 Action Time: 13.37.24.886 Action Data: No

Comments LPA WILL SEND DENIAL, BEYOND WARRANTY, NO OPEN RECALLS.

EPRS-005-LC-0332



# State Farm Insurance Companies®



05 2005

Q8

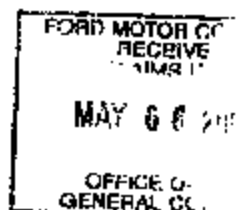
May 2, 2005

Huntsville Service Center  
261 Chateau Drive  
Huntsville, AL 35891  
Telephone: (256) 883-3800

FORD MOTOR COMPANY  
OFFICE OF GENERAL COUNSEL  
PARK LANE TOWERS WEST  
3 PARK LANE BLVD SUITE 400  
DEARBORN MI 48126

## Notice of Subrogation

Re: Claim Number [REDACTED]  
Date of Loss February 22, 2005  
City/State of Loss Albertville, Alabama  
Our Insured [REDACTED]  
Vehicle 1997 Ford F150 pickup  
VIN Number 1FTDX1720VN [REDACTED]  
Mileage 180,815



Ford Motor Company:

This notice is to advise of a loss that occurred to our insured vehicle and/or property. The damage was caused by a failure of the components/assemblies located at the left rear quadrant of the motor compartment, most probably the speed control deactivation switch.

Our investigation indicates that Ford is responsible for this loss. By virtue of our payment, we are entitled to recover from the responsible party. Please consider this letter as our demand to Ford for reimbursement of \$7,228.00, less salvage.

Any settlement by Ford with State Farm's policyholder with respect to the above-described design issue must not prejudice our rights, as subrogor, and shall not be released by the execution of a general Release with such policyholder.

In order to assist you in evaluating and processing the subrogation claim we are asserting, we may provide nonpublic personal information about our customer. We are sharing this information to effect, administer, or enforce a transaction authorized by the consumer. However, you are neither authorized nor permitted to: (1) use the customer information we provide for any purpose other than to evaluate and process the subrogation claim, or (2) disclose or share the customer information we provide for any purpose other than to evaluate and process the subrogation claim.

ER05-005-LC-0333

Your cooperation is appreciated. If you should have any questions or would like to set up an appointment to inspect the salvage, please feel free to contact me at (256) 883-3800 or at the address listed above.

Sincerely,



Yarn Newman  
Claim Representative  
Phone: (256) 883-3800  
State Farm Mutual Automobile Insurance Company

013/0429005AL

Enclosure: Copy of fire report from Technifire regarding loss of vehicle



**A Privileged and Confidential Report**

**Prepared For**

**State Farm Insurance Company  
c/o Mr. Vann Newman**

**Insured**

[REDACTED]

**Policy Number**

[REDACTED]

**Claim Number**

[REDACTED]

**TechniFire Number  
050329-03-D-5560**

**TechniFire Services Company LLC**

**Insured:****Policy Type:**

Auto Coverage

**Date of Loss:**

February 22, 2005

**Loss Location:**

Albertville, AL

**Risk Information:****Make:** Ford**Model:** F-150 pickup**Year:** 1997**VIN:** 1FTDX1720VN**Mileage:** 180,815**Notes:**

The insured reports that the vehicle had been driven prior to the occurrence of the fire; however, it was parked at the time the fire occurred.

**File History**

Jerry Carter is the assigned investigator representing TechniFire Services Company.

On March 29, 2005, this file was established under the direction of Mr. Vann Newman, who represents State Farm Insurance Company in Huntsville, Alabama.

On March 30, 2005, the vehicle examination was conducted at Source One Solutions in Tanner, Alabama.

On March 30, 2005, a verbal report was provided to Mr. Vann Newman.

**During the investigation:**

- a) the salvage was examined for cause and origin determination; and
- b) information was provided by Mr. Vann Newman.

**Instructions Received:**

The following instructions were provided upon receipt of this assignment:

Conduct salvage inspection for C & O

**Persons referred to in this report:**

Ms. Kim Kennamer	Insured
Mr. Vann Newman	State Farm Insurance Co.

**Subrogation potential:**

Subrogation may exist against the vehicle manufacturer.

## **Origin and Fire Spread**

The fire began at the left rear quadrant of the motor compartment adjacent to the location of the master cylinder and speed control deactivation switch. Flame development was to the combustible components including the wiring insulation.

The area of heaviest degradation within the motor compartment was at the left rear quadrant. Melting and degradation of the aluminum hood also occurred. Damage throughout the remainder of the motor compartment was the result of heat and flame impingement and was to a lesser degree.

The fire was extinguished prior to total vehicle involvement, but not before extensive damage had occurred.

## **Fire Causation**

The fire was caused by a failure of the component/assemblies located at the left rear quadrant of the motor compartment most probably the speed control deactivation switch. The opinion as to the fire cause is based on the following:

- 1) Fire flow patterns on the firewall/bulkhead, left front fender, master cylinder assembly, hood and adjacent motor compartment components indicating the fires inception at the left rear quadrant of the motor compartment adjacent to the master cylinder assembly and speed control deactivation switch. )
- 2) Burn and char patterns on the master cylinder assembly, firewall/bulkhead, left front fender, hood and the adjacent motor compartment components further indicating the fires development at the left rear quadrant of the motor compartment adjacent to the master cylinder assembly and speed control deactivation switch.
- 3) Oxidation and demarcation patterns on the firewall/bulkhead, hood, left front fender and the adjacent motor compartment components.
- 4) The elimination of the fires inception elsewhere within the vehicle or motor compartment area.
- 5) Information provided by the insured to State Farm Insurance Company.

## **Evidence Obtained During the Salvage Examination**

### **By this Investigator**

No evidence was removed from the vehicle.

### **By other Investigators/Agents**

There was no indication that any evidence had been removed by others prior to my vehicle examination.

## **INSPECTION SUMMARY**

### **Exterior**

The heaviest damage to the exterior of the vehicle occurred adjacent to the motor compartment and includes the hood, windshield, left front fender and to a lesser degree the grill and right front fender area. The hood was down and latched at the inception of the fire. All tires and wheels were on the vehicle at the time the fire occurred. The doors were closed and the windows were in the "up" position. There was no indication that any exterior component had been removed prior to the fire. In fact, even the fuel cap was found in the filler neck.

### **Undercarriage**

All components of the undercarriage were found to have been in their appropriate locations at the time the fire occurred. There is no evidence of the fire's inception at the undercarriage area.

### **Motor Compartment**

The motor compartment was heavily degraded by the fire. The area of heaviest degradation was at the left rear quadrant where melting and degradation of the plastic and aluminum components was evident. The hood was down and latched at the inception of the fire. All components of the motor compartment were found to have been in their appropriate locations at the time the fire occurred. The damage configuration does demonstrate the fire's development at the left rear quadrant, adjacent to the location of the master cylinder assembly and speed control deactivation switch.

### **Passenger Compartment**

The passenger compartment was undamaged by flame. All components of the passenger compartment were found to have been in their appropriate locations at the time the fire occurred. The doors were closed and the windows were in the "up" position. There is no evidence of the fire's inception within the passenger compartment.

## **SYSTEMS**

### **Electrical**

Both the primary and secondary electrical systems were connected when the fire occurred. The battery was found in the motor compartment. There was no evidence of overt shorting or arcing found to indicate a failure of the battery or primary wiring as a cause of the fire. The heaviest degradation of the secondary wiring in the motor compartment occurred at the left rear quadrant, that damage is the result of heat and flame impingement. The secondary wiring in the passenger compartment was undamaged by flame. The fire did occur as a result of a failure of the components/assembly located at the left rear quadrant most probably the speed control deactivation switch.

### **Fuel System**

The fuel tank and all rigid and flexible lines were connected when the fire occurred. There were no breaks or deformities found in the rigid lines running from the tank to the motor compartment. The fuel system components within the motor compartment did receive damage as a result of heat and flame impingement. There was however no evidence that a failure of the fuel system occurred. In fact, a failure of the fuel system is eliminated as a potential fire cause.

### **Drive Train**

The level of the motor oil could not accurately be determined. The vehicle is equipped with a standard transmission. All of the major drive train components were found in their appropriate locations and externally appeared to be operable. There is no indication that a failure of the drive train caused the fire.

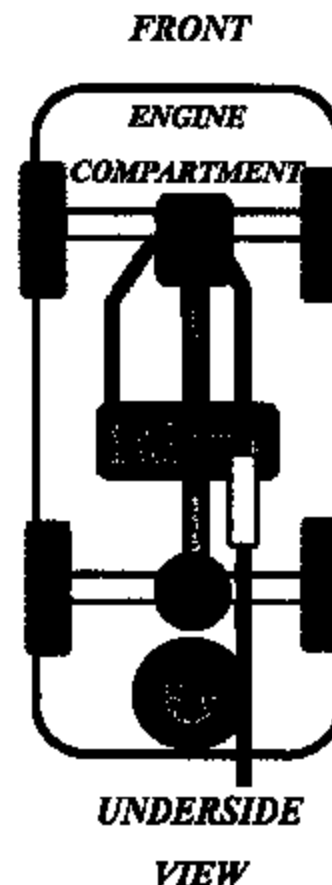
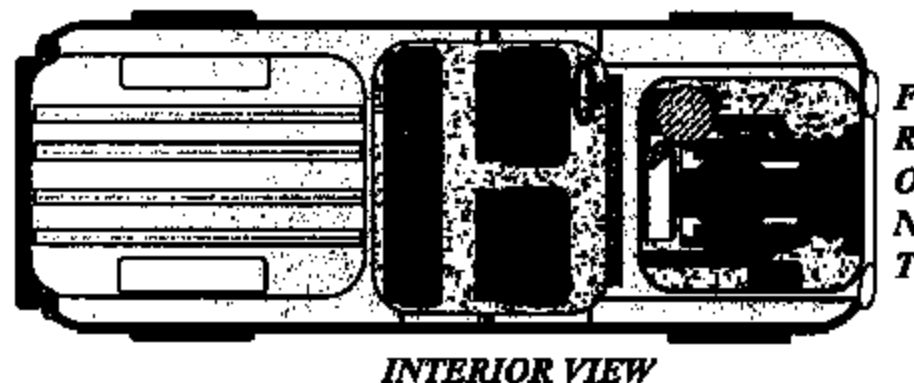
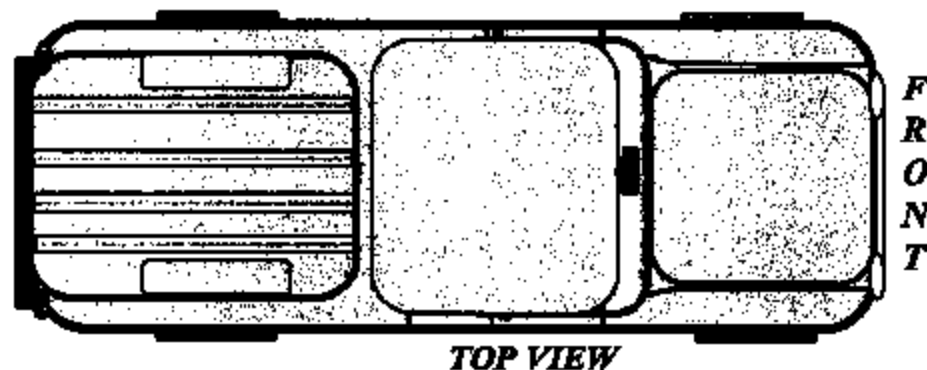
Insured: [REDACTED]

DOL: 02-22-05

Policy No.: [REDACTED]

Claim No.: [REDACTED]

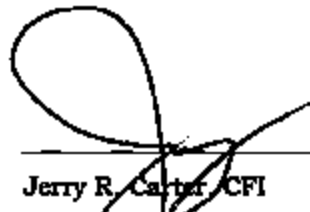
TechniFire No. : 050329-03-D-5560



Area of Origin

Note: Not to scale, for illustration only.

Submitted this 8<sup>TH</sup> day of April, 2005.

A handwritten signature in black ink, appearing to read "Jerry R. Carter", is written over a horizontal line.

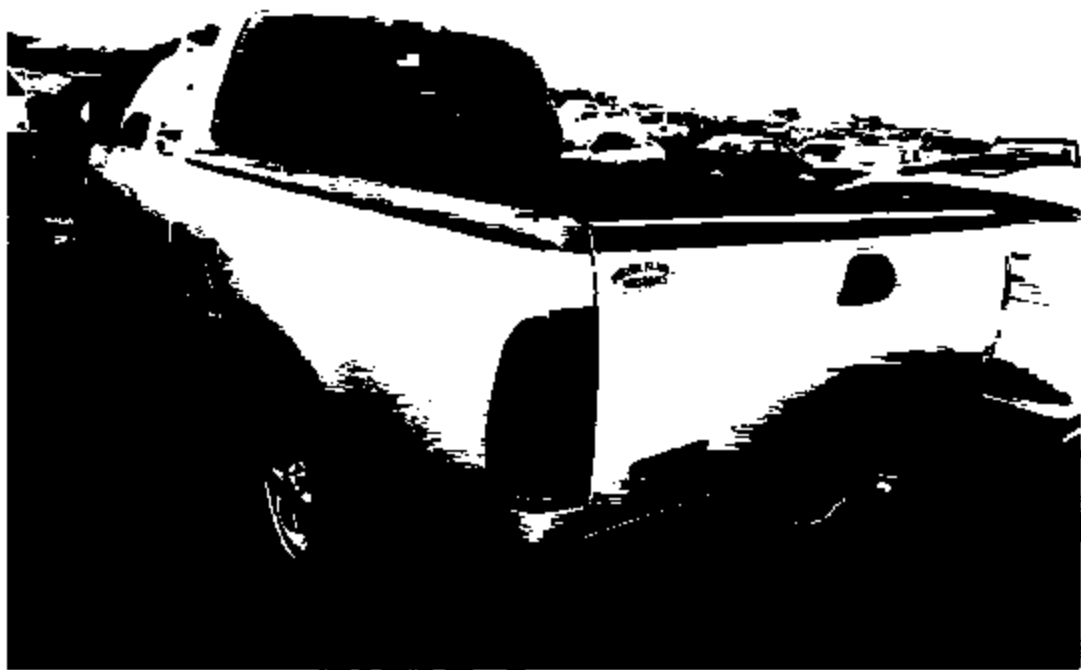
Jerry R. Carter CFI

TechniFire Services Company  
P. O. Box 17356  
Chattanooga, TN 37415  
(423) 876-1700



**Photo Information**

1. Front and driver side of the vehicle.(3)



**Photo Information**

2. Rear and driver side of the vehicle.(9)



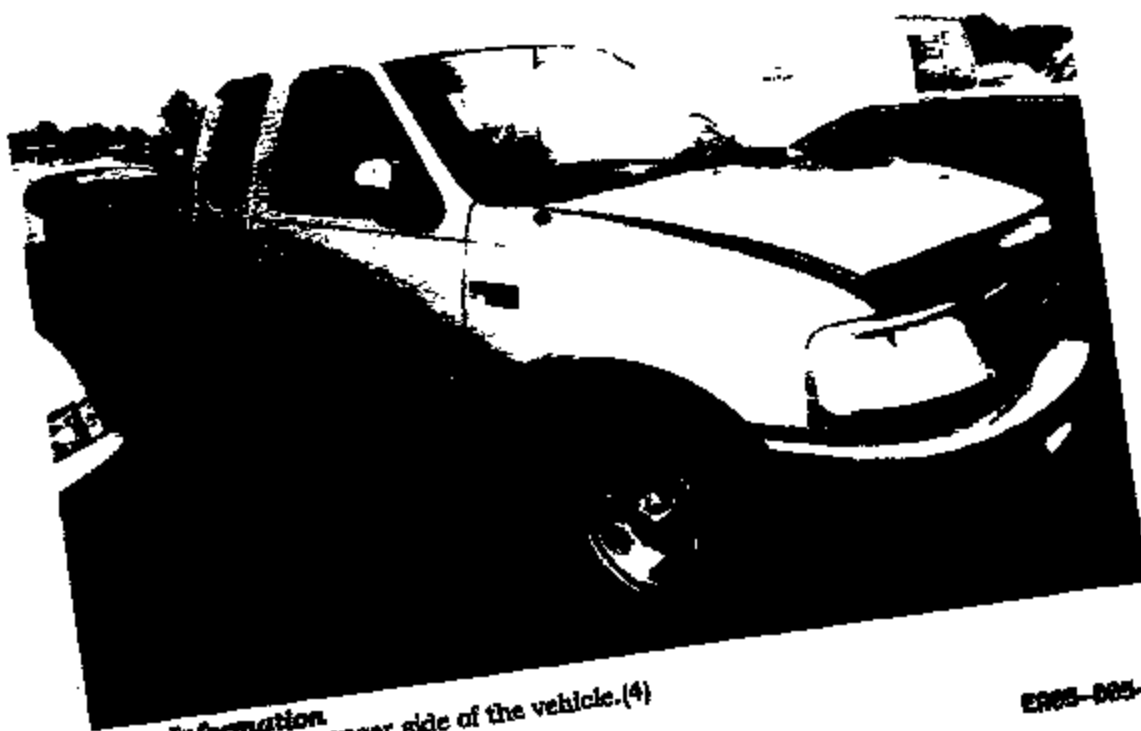
TechniFire Services Company

Claim No. [REDACTED]

TechniFire No. 050329-03-D-5560



**Photo Information**  
3. Rear and passenger side of the vehicle.(7)



**Photo Information**  
4. Front and passenger side of the vehicle.(4)

2005-005-L

CL-1



**Photo Information**

5. The right front tire and wheel showing tread design and condition.(5)



**Photo Information**

6. The fuel filler neck showing the cap to be in place.(12)



**Photo Information**

7. The undercarriage area beneath the rear showing no evidence of the fires development at the undercarriage area.(11)



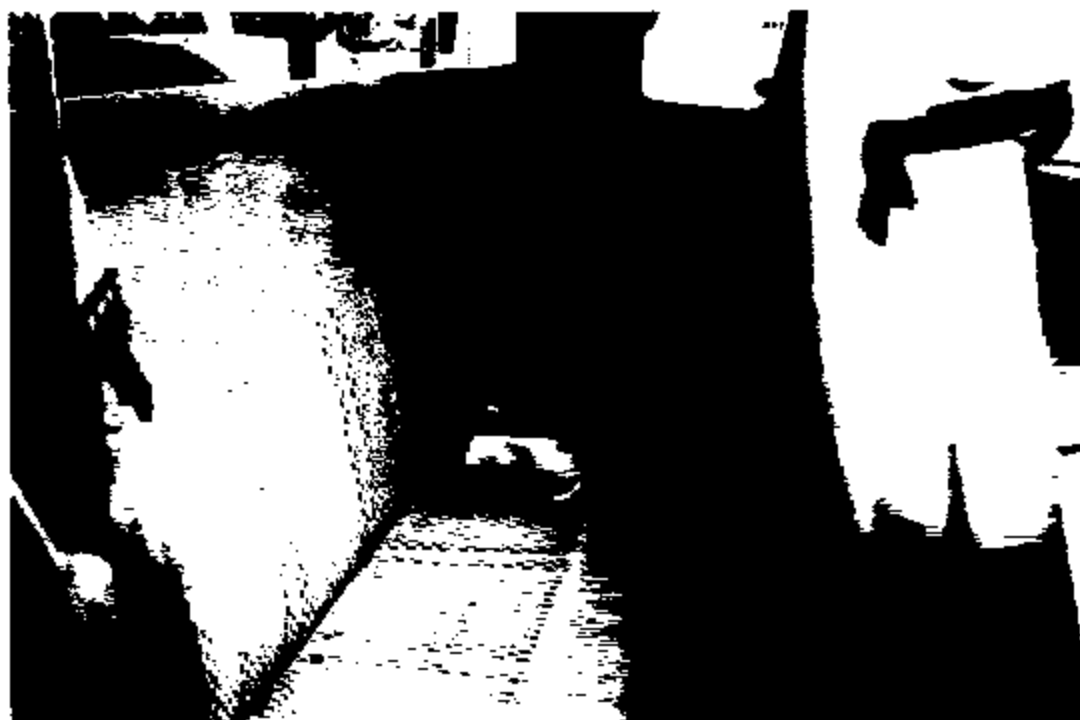
**Photo Information**

8. The undercarriage area beneath the motor compartment, again showing no evidence of the fires inception at the undercarriage area.(37)



**Photo Information**

9. The cargo storage bed area.(8)



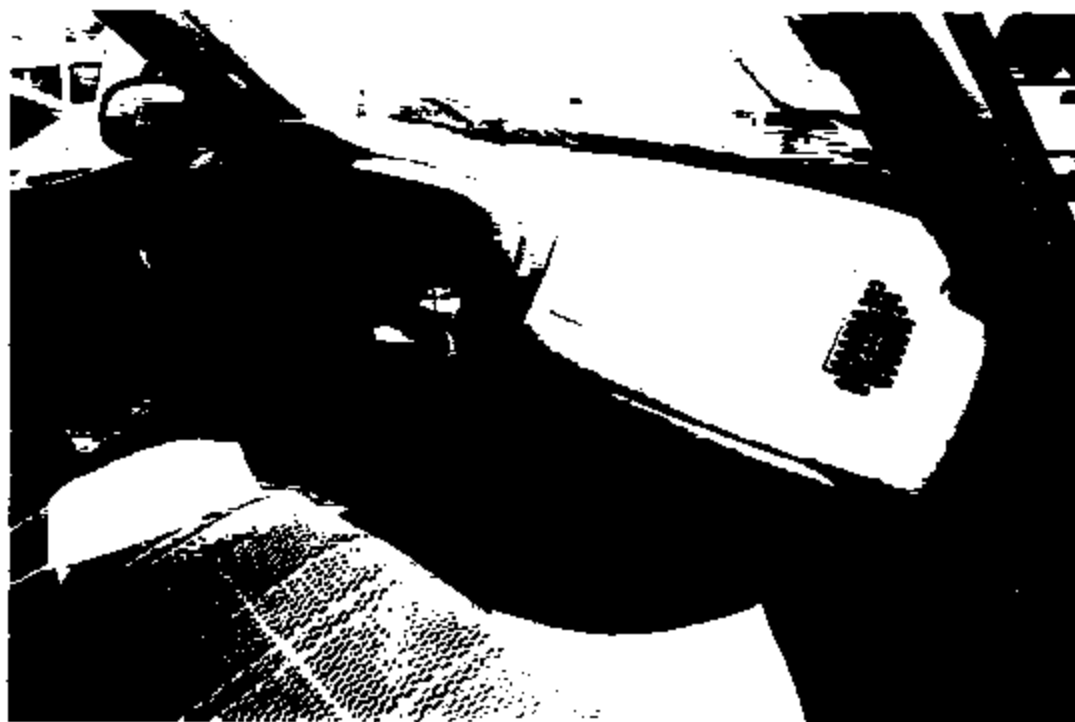
**Photo Information**

10. The rear seating area of the passenger compartment showing no evidence of the fires development within the passenger compartment.(18)



**Photo Information**

11. The front seating area of the passenger compartment again showing no evidence of the fire development at the seat or floorboard.(16)



**Photo Information**

12. The dash. All components were found to have been in their appropriate locations at the time the fire occurred.(17)

**Photo Information**

13. Additional view of the dash showing the instrument cluster. Again there is no evidence of the fires inception within the dash.(13)

**Photo Information**

14. The hood and front grill area. The hood was down and latched at the inception of the fire. Note that the heaviest degradation is at the left rear quadrant.(6)



**Photo Information**

15. Overview of the motor compartment and underside of the hood.(19)

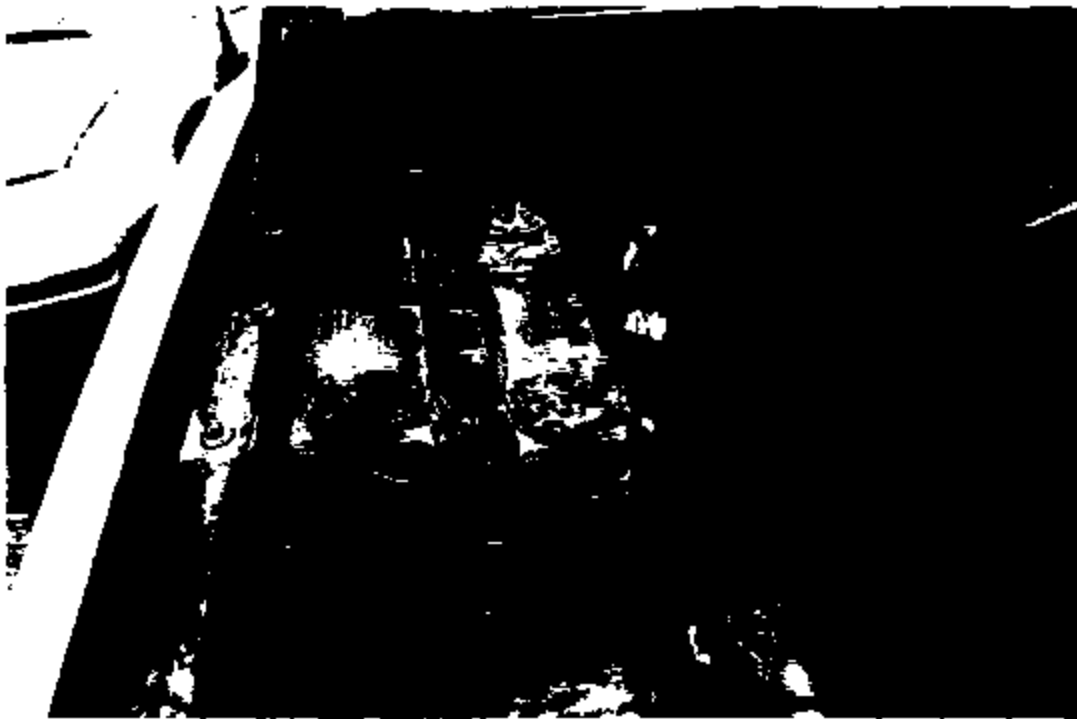


**Photo Information**

16. The driver side of the motor compartment. The area of heaviest degradation is at the left rear quadrant. All components were found to have been in their appropriate locations at the time the fire occurred.(21)

**Photo Information**

17. The passenger side of the motor compartment. Again note that the heaviest degradation is at the left rear quadrant adjacent to the master cylinder and speed control deactivation switch.(22)

**Photo Information**

18. The battery and primary electrical wiring showing no evidence of overt shorting or arcing.(23)



**Photo Information**

19. Overview of the left rear quadrant of the motor compartment. The wiring harness conductors located in this area were damaged as a result of heat and flame impingement.(25)

**Photo Information**

20. Additional view of the left rear quadrant of the motor compartment. The oxidation, demarcation and burn patterns on the components as well as the firewall/bulkhead do indicate the fires inception adjacent to the location of the speed control deactivation switch.(28)



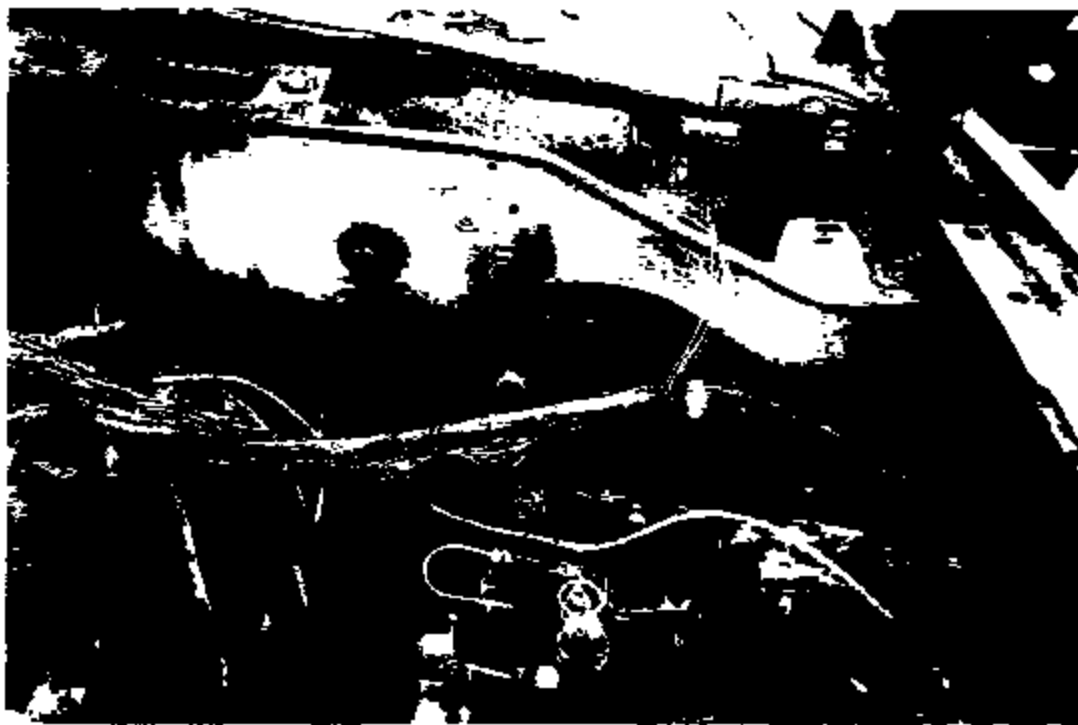
**Photo Information**

21. Close up view of the area of origin. Again the burn and char patterns do indicate the fires inception within the motor compartment adjacent to the location of the speed control deactivation switch at the left rear quadrant.(29)



**Photo Information**

22. Close up view of the wiring harness conductors located at the left rear quadrant. There was no evidence of overt shorting or arcing.(30)



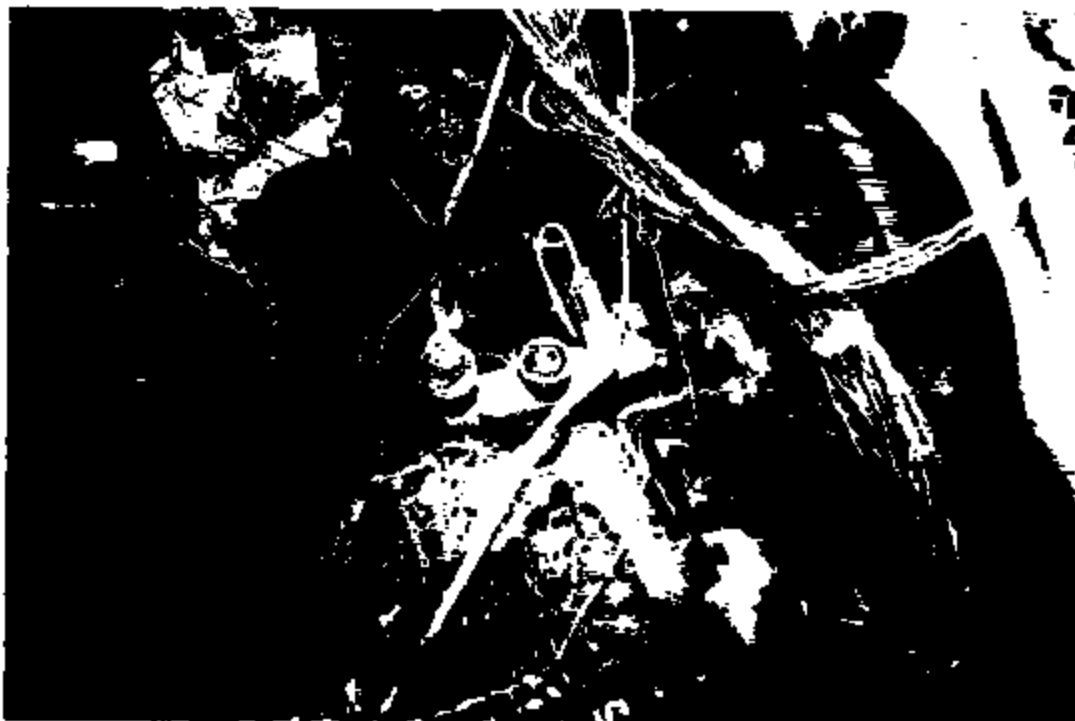
**Photo Information**

23. Additional view of the wiring harness conductors located at the left rear quadrant again showing no evidence of overt shorting or arcing.(31)



**Photo Information**

24. Close up view of the firewall/bulkhead, windshield wiper motor and adjacent windshield. Again the burn and char patterns do indicate the fire inception within the motor compartment at the left rear quadrant.(32)



**Photo Information**

25. Close up view of the area of origin. The burn and char patterns on the assemblies adjacent to the master cylinder do indicate the fire's inception at the location of the speed control deactivation switch. (35)



**Photo Information**

26. Close up view of the speed control deactivation switch and adjacent wiring conductors showing evidence of localized overheating and degradation. (27)



**Photo Information**

27. The hood. The oxidation and demarcation patterns further demonstrate the fires development at the left rear quadrant adjacent to the location of the speed control deactivation switch and master cylinder.(20)



APR 13 2005

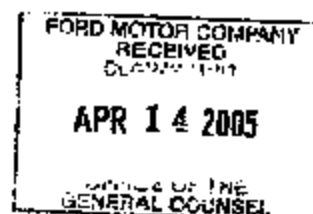


**Tennessee Farmers Mutual Insurance Companies**  
1122-B 2nd Avenue North, 1st Floor  
Nashville, TN 37208  
Phone 615-244-6822 Fax 742-4244

**April 05, 2005**

**Ford Motor Company**  
**P. O. Box 6248**  
**MD-3NE-B**  
**Dearborn, Michigan 48126**

**Re: Claim # [REDACTED]**  
**Insured: [REDACTED]**  
**D/L: 02/01/05**  
**County: Dyer**  
**Amount Due: PENDING**



**To Whom It May Concern:**

**Investigation of the above accident indicates you are legally responsible for resulting damages.**

**Tennessee Farmers Mutual Insurance Company has paid the above amount, which includes our insured's deductible.**

**If you are insured, refer this letter to your insurance company for payment. If you are not insured, send your payment to Tennessee Farmers Mutual Insurance Company directed to my attention. If no reply or payment is received within 15 days of the date of this letter, we will take action to collect this account.**

**Sincerely,**

**TENNESSEE FARMERS MUTUAL INSURANCE COMPANY**

  
**Matthew Rivers**  
**Field Service Representative**

**MR:lb**

**Enclosures**

**ER05-005-LC-0356**

# VCE, INC.

## Forensic Investigations REPORT

### REPORT NO. 05-041

NAME OF COMPLAINANT: [REDACTED]

ADDRESS: [REDACTED] Antioch, TN [REDACTED]

TYPE: Vehicle Fire Cause and Origin —

DATE OF LOSS: 2-01-05 DATE OF INVESTIGATION: 2-07-05

PROJECT: Vehicle Fire Cause and Origin, 1998 Ford F150 Truck

CLAIM NO.: 77-01076180

#### REPORT OF INVESTIGATION:

This report covers the investigation of a fire of unknown cause and origin that occurred in the 1998 Ford F150 truck, VIN 1FTRX08L8WK [REDACTED] on February 1, 2005. The investigation was made to determine the cause and origin of the fire. The report also contains field notes and photographs made at the scene.

(Continued on page 2)

#### CONCLUSIONS:

The burned 1998 Ford F150 truck was examined; photographs and other evidence outlined in the report were analyzed. The conclusion is that the cause of the fire was accidental. The vehicle was parked at 5:00 pm and the fire was discovered about 8:00 pm. The most likely cause of the fire was from an energized electrical circuit when the ignition switch was turned off. A recall had been initiated for the 2000 model of this vehicle with the same type Speed Control Deactivation Switch. It is my conclusion that the most likely cause of this fire was the failure of the Deactivation Switch. For a more detailed summary of conclusions and determinations, see page 8 of this report. For a detailed analysis, see pages 2 thru 6 of this report.

DATED AT Nashville, Tennessee THIS 21st DAY OF February, 2005

DEWEY N. GRIFFIN - INVESTIGATOR

*Dewey N. Griffin*

EA05-685-LC-8357



The vehicle fire cause and origin investigation was conducted on February 7, 2005. Field notes sheets 1 thru 5 of the attached field notes show details of the field investigation. The exterior of the truck is shown on field note sheet 1 and on photographs [REDACTED] F150 1 thru 9. The photographs show that the fire was concentrated in the engine area with extensive damage in the passenger compartment. The windshield and most of the windows broke during the fire. The drivers' side of the engine area received the most damage with the front tire having burned. The passengers' side front tire had heat damage, but did not lose air and go flat. Photograph 17 shows that the bed of the truck was unburned by the fire.

[REDACTED] F150-1 thru 9, 17

		ISSUE LIST		
Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
2/4/2005 CLOSED	[REDACTED] LEGAL - ACCIDENT / FIRE	1FTRX08L8W [REDACTED] 643231381	1998 F-SERIES	07
5/18/2001 CLOSED	[REDACTED] RAV - OTHER	1FTRX08L8W [REDACTED] 643231381	1998 F-SERIES	02

ERB-005-LC-0359

## All Action Details for Issue

Print

VIN: 1ETR0818V0 [REDACTED] Year: 1996 Model: F-SERIES Case: 643231361  
Name: [REDACTED] Owner Status: Original WSD: 1997-12-18  
Symptom Desc: FIRE/SMOKE SCORCHED/BURNT PASSENGER AREA Primary Phone: [REDACTED]  
Reason Desc: LEGAL - ACCIDENT / FIRE Secondary Phone: [REDACTED]  
Issue Type: 07 LEGAL Issue Status: CLOSED

Action: ADVISE CUST INFORMATION WILL BE SENT TO CONSUMER AFFAIRS - FIRE  
Dealer: 05859 UNION CITYFORD L-M, INC. Origin Desc: US CONCERN CASE BASE  
Odometer: 103000 MI Comm Type: PHONE  
Analyst Name: MARIANA ANESETTI Analyst: MANESETT  
Action Date: 02/02/2005 Action Time: 10.49.20.115 Action Data: No

Comments CUSTOMER SAID: CUST WAS CALLED TO COME OUTSIDE AT 5 AM IN THE MORNING DUE TO HIS B-VEH BEING UP IN FLAMES FIRE DEPT WAS OUT SIDE ALREADY AND A REPORT WAS FIELD WITH THE NASHVILLE FIRE DEPT CUST SAYS THAT THE FIRE STARTED IN THE ENGINE COMPARTMENT FRONT RIGHT TIRE WAS COMPLETELY MELTED LOCATION WAS AT CUST HOME , IN PARKING LOT NO INJURIES INSURANCE COMPANY HAS BEEN NOTIFIED VEH HAS BEEN TOTALED/CRC ADVISED: - I WILL FORWARD THIS INFORMATION TO OUR CONSUMER AFFAIRS GROUP. SOMEBODY FROM CONSUMER AFFAIRS WILL CONTACT YOU IN 2 BUSINESS DAYS. PLEASE NOTIFY YOUR INSURANCE CARRIER AND REPORT THIS INCIDENT.

Action: SEND ACKNOWLEDGEMENT LETTER TO CUSTOMER  
Dealer: 05859 UNION CITYFORD L-M, INC. Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Odometer: 103000 MI Comm Type: MAIL  
Analyst Name: FONSECA, LOURDES Analyst: LFONSECA  
NEARON (L.C.)  
Action Date: 02/04/2005 Action Time: 11.15.44.986 Action Data: No

Comments LPA WILL SEND DENIAL, NOT INVOLVED IN ANY OPEN RECALL RELATED TO FIRE

Action: DENY ASSISTANCE - BEYOND WARRANTY  
Dealer: 05859 UNION CITYFORD L-M, INC. Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Odometer: 103000 MI Comm Type: MAIL  
Analyst Name: FONSECA, LOURDES Analyst: LFONSECA  
NEARON (L.C.)  
Action Date: 02/04/2005 Action Time: 11.46.52.156 Action Data: No

Comments LPA WILL SEND DENIAL LETTER TO CUSTOMER. BEYOND WARRANTY, NOT INVOLVED IN ANY OPEN RECALLS/ONPS.

E905-085-LC-0310

## All Action Details for Issue

Print

VIN: 1ETBX08LAWK	Year: 1998	Model: F-SERIES	Case: 643231361
Name:	Owner Status: Original	WSD: 1997-12-18	
Symptom Desc: AUTO TRANS NO ENGAGEMENT UNINTEND MVMNT		Primary Phone:	
Reason Desc: RAV - OTHER		Secondary Phone:	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: AWARD ESP POWERTRAIN CARE 5/75

Dealer: 05959 UNION CITYFORD L-M, INC.

Origin Desc: CONSUMER AFFAIRS - REACQUIRED VEHICLES

Odometer: 48608 MI

Comm Type: MAIL

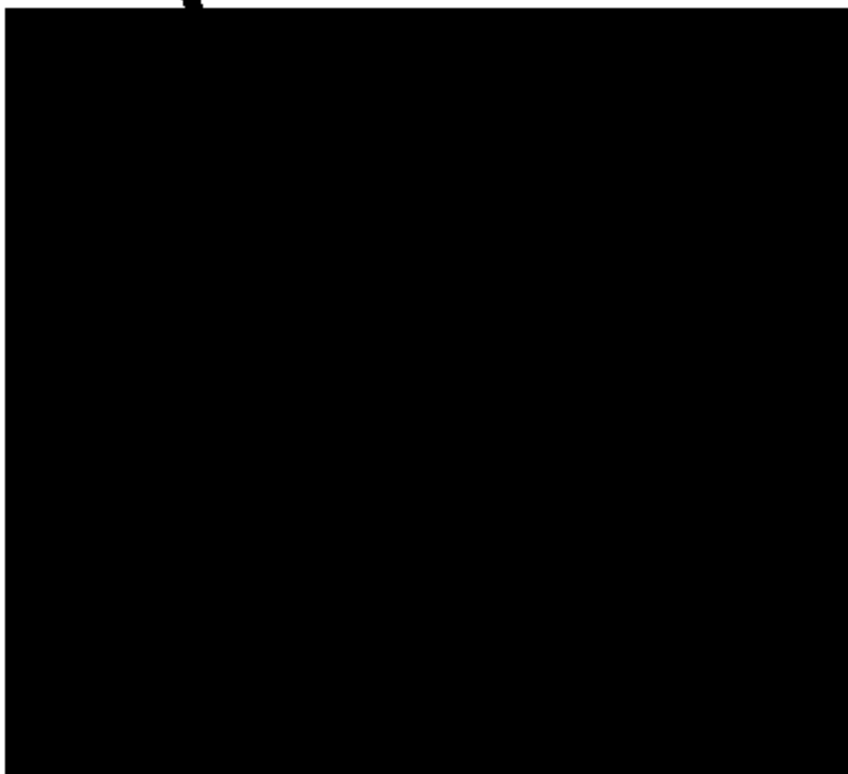
Analyst Name: IBARRA, SYLVIA (S.) Analyst: SIBARRA

Action Date: 05/18/2001

Action Time: 17.52.02.335 Action Data: No

Comments: ESP CONTRACT ISSUED

E005-005-LC-0361



# State Farm Insurance Companies\*



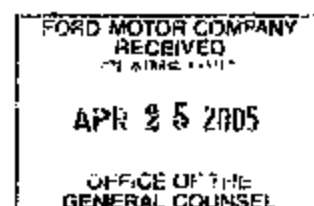
APR 25 2005

April 20, 2005

CERTIFIED MAIL

Ford Motor Company  
Attn: Howard Keyes  
Parklane Tower West # 400  
3 Parklane Blvd.  
Dearborn, MI. 48126

Claim Number: [REDACTED]  
Date of Loss: April 1, 2005  
Insured: [REDACTED]  
Vehicle: 2001 Ford Expedition  
VIN: 1FMUR15W311 [REDACTED]



Dear Mr. Keyes:

The identified vehicle is insured by State Farm Mutual Automobile Insurance Company. This vehicle has experienced a fire originating from speed control activation switch.

State Farm Insurance would like to give you an opportunity to inspect the vehicle. In addition, we would like to give you advanced notice of potential subrogation. Please contact me at 408-503-4530 to set up a time for your inspection. We request that the inspection occur within 30 days from the date of this letter so we may move forward with the resolution of this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rick Benedict".

Rick Benedict  
Vehicle Investigator  
State Farm Mutual Automobile Insurance Company  
408-503-4530

EN05-005-LC-0362



The ProNet Group, Inc.

14765 Preston Road  
Suite 500  
Dallas, Texas 75254  
972.908.8338 (phone)  
800.996.8377 (toll free)  
info@pronetgroup.com  
www.pronetgroup.com

## REPORT OF FINDINGS

Claim No: [REDACTED]  
Date of Loss: 11/02/04

### VEHICLE FIRE EVALUATION

INSURED: [REDACTED]  
2001 FORD EXPEDITION

Prepared for:

FARMERS INSURANCE GROUP  
200 CHISHOLM PLAVE, SUITE 200  
PLANO, TEXAS 75075

Randy Callison, ASE, CFEL, CVFI  
Project Manager

November 30, 2004

ProNet File No. 7674

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## I. INTRODUCTION

On November 2, 2004, a fire occurred involving a Ford vehicle. On November 8, 2004, The ProNet Group, Inc., was retained by Ms. Pandora Dysart of Farmers Insurance Group to inspect the vehicle and determine the origin and cause of the fire.

On November 10, 2004, The ProNet Group inspected the vehicle at City of Irving Pounds, located at 400 West Shady Grove in Grand Prairie, Texas. During this visit, the vehicle was inspected and photographs were taken to document our observations. The observations described and pictured in this report are representative of the conditions observed during our visit. This report will not reflect all conditions of the vehicle, but will demonstrate typical conditions observed. All photographs are available for review.

## II. BASIS OF REPORT

This report is based on the following:

1. Inspection of the vehicle.
2. Review of the fire incident report (see Attachment A).
3. Research of the National Highway Traffic Safety Administration (NHTSA) records to identify any preliminary evaluations, engineering analyses, or recalls on 2001 Ford Expedition vehicles.
4. Information and observations as noted in this report.

This report is based upon information available to us at this time, and is not necessarily final. Should additional information be presented or discovered, we reserve the right to review and, if necessary, revise this report and our conclusions in light of that information. We also reserve the right to be present and observe any and all inspections or testing by any other concerned parties.

#### **IV. CONCLUSION**

Based on our findings and observations as noted in this report, it is our opinion the 2001 Ford Expedition vehicle fire originated in the left third of the engine compartment and the cause of the fire remains undetermined.

#### **V. DISCUSSION**

##### **INTERVIEWS**

On November 11, 2004, an interview was conducted with Mr. Mike Hagman, the manager of the Millennium Property, and the following information was obtained:

1. The interview revealed there were possibly two (2) witnesses to the fire, Mr. [REDACTED]

2. Several attempts have been made to interview these witnesses. As of this date, no contact has been made by for an interview with reference to this loss.

Numerous attempts were also made to contact the owner of the vehicle, [REDACTED] by telephone for an interview. However, as of this date no contact has been established.

## VEHICLE DESCRIPTION

The vehicle was identified as a black four-door 2001 Ford Expedition bearing Vehicle Identification No. 1FVWRU17W01L [REDACTED] and Texas license plate No. [REDACTED]

## EXTERIOR INSPECTION

Our inspection of the exterior of the vehicle revealed:

1. The burn patterns observed are consistent with a fire originating in the engine compartment.
2. The front fenders were void of paint. The front corner and interior of the left front fender evidenced bluing of the metal indicative of intense heat. The front third section of the left front fender evidenced prior body damage.
3. All glass had shattered or melted.
4. The hood was consumed and an aftermarket support brace was secured to the left hood hinge.
5. All combustibles on the front face of the vehicle were consumed.
6. The right upper quadrant of the right front door panel was void of paint. The left front door panel and the front third section of the left rear door panel were void of paint.
7. The outside mirrors were melted.

8. The roof panel was void of paint.
9. The right front tire was approximately 60 percent consumed and the left front tire was completely consumed. The interior side of the right front wheel had melted and the left front wheel was 90 percent melted indicating the fire was more intense at the left third section of the engine compartment.

#### PASSENGER COMPARTMENT

Our inspection of the passenger compartment revealed a progressive type burn pattern, more intense at the vehicle firewall and less intense towards the vehicle cargo area. The dash was completely consumed. There were a significant amount of personal effects in the passenger compartment.

#### ENGINE COMPARTMENT

Our inspection of the engine compartment revealed:

1. An intense lower to upper level burn.
2. The vehicle was equipped with a fuel injected V-8 engine coupled to an automatic transmission.
3. The condenser core was consumed. All that remained of the radiator was the left lower corner indicative of a fire that propagated from the left third section of the compartment to the right. The left edge of the core support exhibited bluing of the metal indicative of intense heat.

4. The right valve cover was burned, but basically intact. The left valve cover was 80 percent consumed.
5. The battery was consumed.
6. The right front body mount was burned, but partially intact. The left front body mount was approximately 60 percent consumed, consistent with a fire that was more intense in the left third section of the compartment.
7. Fifty percent (50%) of the right half of the timing chain housing had melted. Seventy percent (70%) of the left half of the timing chain had melted indicative of a fire that was more intense in the left third section of the compartment.
8. The ABS electro hydraulic control unit, located on the left frame rail above the left front control arm bushing, was severely burned. The ABS mount had evidence of bluing of the metal indicating intense heat.
9. The power distribution center, located on the left fender-well, was severely burned. The speed control servo, located forward of the power distribution center, was basically consumed. The inboard side of the left front fender in the area of the power distribution center and the servo evidenced bluing of the metal, indicative of intense heat.
10. The brake master cylinder was consumed and the brake booster evidenced bluing of the metal.
11. The remains of the speed control deactivation switch were not located in the engine compartment fire debris, on the left frame rail, or on the left lower control arm. The section of the speed control deactivation switch

power supply (B+) wire was missing from the wiring harness adjacent too the speed control servo to the switch.

#### RECALLS

We researched the National Highway Traffic Safety Administration (NHTSA) database to identify any preliminary evaluations, engineering analyses, recalls and consumer complaints on 2001 Ford Expedition vehicles relating to electrical failures that result in fires.

A search of their records indicated problems relating to electrical failures resulting in fires within 2001 Ford Expedition vehicles (see Attachment B). Specifically:

1. NHTSA recall No. 01V258000 was found relating to windshield wiper motor fires. This was ruled out as the fire cause, as there was no evidence of failure and inconsistencies in a fire originating at the wiper motor.
2. A number of consumer complaints regarding engine compartment fires have been reported.
3. NHTSA Engineering Analysis No. EA02-025. The subject of this analysis was speed control deactivation switch fire involving the 1992-1997 Town Car, Crown Victoria and Grand Marquis vehicles. While this report does not pertain to the 2001 Ford Expedition, the speed control deactivation switch (SCDS) is basically identical. Furthermore, a significant number of switch failures, which have resulted in fires, have been documented in 1997-2001 Ford trucks and SUV's, which includes the 2001 Expedition. While the burn patterns were similar to a SCDS fire, no physical evidence was found that would indicate that the switch failed and caused the fire.

## SUMMARY

In summary, our inspection of this 2001 Ford Expedition vehicle revealed the fire originated in the left third section of the engine compartment as evidenced by the burn patterns. The cause of the fire appears to have resulted from an electrical short circuit, however no definitive conclusion could be reached in regards to a specific component point of failure. Furthermore, several attempts were made in an effort to interview the reported two (2) eyewitnesses to the fire, as well as the driver of the vehicle; unfortunately as of the date of this report, no contact has been made with these witnesses.

**V. ATTACHMENTS**

**A. FIRE INCIDENT REPORT**

November 30, 2004

Page 10

ProNet File No. 7674

ER05-005-LC-0372



11/18/04 11:33 FAX

## FIRE PREVENTION DIVISION

002

FDID State Date Station Inc No Exposure  
 A 00717 TX 11/02/2004 8 415074 00

## B Address

IRVING TX

## E1 Dates and Times

Alarm 11/02/2004 12:54:33  
 Arrival 11/02/2004 12:59:36  
 Controlled  
 Last Cleared 11/02/2004 15:18:46

## C Incident Type

Mobile property (vehicle) fire, oth

## E2 Shifts &amp; Alarms

Shift B  
 Alarms  
 District 8

## D Aid Given or Received

None

Their FDID Their State

Their Incident Number

## F Actions Taken

11 Extinguish

## G1 Resources

Supp.  
 EMS  
 Other

App Personnel  
 6 17  
 0 0  
 1 1

## G2 Est. Dollar Losses

Property \$48,000  
 Contents \$0

## H1 Casualties

Deaths Injuries

Fire Svc 0 0  
 Civilian 0 0

## H2 Hazardous Materials Released

I Mixed Use Property

## H3 Detector

## I Property Use

Property Use, other

## J1 Person/Entity Involved

Business Name

Phone Number

Person Name

Address

## J2 Owner

Business Name

Phone Number

Name

Address

IRVING

TEXAS

## K Remarks

11/16/04 TUE 11:33 PM

FIRE PREVENTION DIVISION

2803

Authentication

Officer in Charge

04117 BOSS, JAMES M

IN Name

BATTALION-CHIEF  
Position/Rank

B11H  
Asgmt

11/02/2004  
Date

Member Making Report

05798 LOWETT, RODNEY A

IN Name

LIEUTENANT  
Position/Rank

B08  
Asgmt

11/02/2004  
Date

11/16/04 TUE 11:34 FAX

## FIRE PREVENTION DIVISION

0001

2-FIRE

FDID State Date Station Inc No Exposure  
 00917 TX 11/02/2004 8 415074 00

B1 Estimated Number of  
 Residential Units

B1 Acres Burned (If Outside)  
 0

B2 Number Rides Involved

C On Site Materials or Products  
 B11 Autos, trucks, buses, recreational veh  
 UU Undetermined  
 UU Undetermined  
 UU Undetermined

D1 Area of Fire Origin

32 Highway, parking lot, street, on  
 or near

E1 Cause of Ignition  
 5 Cause under investigation

D2 Heat Source

UU Undetermined

E2 Factors Contributing to Ignition  
 UU Undetermined

D3 Item First Ignited

E3 Human Factors Contributing to Ignition

30 General materials, other (conversion  
 None

UU N

UU N

D4 Type of Material First Ignited

UU Undetermined

N Estimated Age (If Factor)

N

F1 Equipment Involved in Ignition

F2 X Equipment Power

UU Undetermined

F3 Equipment Portability

Brand:

Model:

SN:

Year:

G Fire Suppression Feature  
 MM None

H1 Mobile Property Involved

H2 MM Mobile Property Type and Make

1 Involved in Ignition and Burned  
 Passenger car.

MM 11

MM 10

MM

Mobile Property Model  
 EXPEDITION

Year

2001

License Plate

State

Tag

VIN

UNK

3-Station Station

EP05-005-LC-0375

11/18/04 TUE 11:34 FAX

FIRE PREVENTION DIVISION

2003

1. Structure Type Other

2. Occupied and Operating

13 Building Height

# Stories at or Above Grade 1  
# Stories Below Grade 1

14 Main Floor Size  
Total Square Feet 5000  
or  
X

15 Fire Origin

15.1 Fire Origin 1

16 Number of Stories Damaged by Flame  
Minor Damage  
Significant Damage  
Heavy Damage  
Extreme Damage

17 Fire Spread

17.1 Confined to Building of Origin

18 Material Contributing Most to Flame Spread

19 Item Contributing Most to Flame Spread

20 Type of Material Contributing Most to Flame Spread

21 Presence of Reflectors

21.1 Not Present

22 Detector Operation

23 Detector Type

23.1 Detector Effectiveness

24 Detector Power Supply

24.1 Detector Failure Reason

25 Automatic Extinguishment System

25.1 Not Present

26 Number of Sprinkler Heads

27 Type of AFS

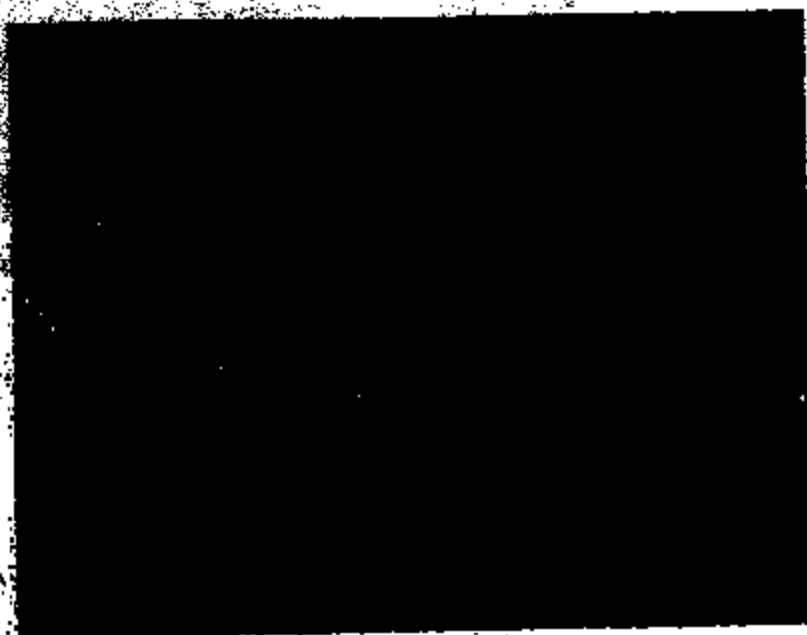
27.1 AFS System Failure Reason

28 Automatic Extinguishment System Operation

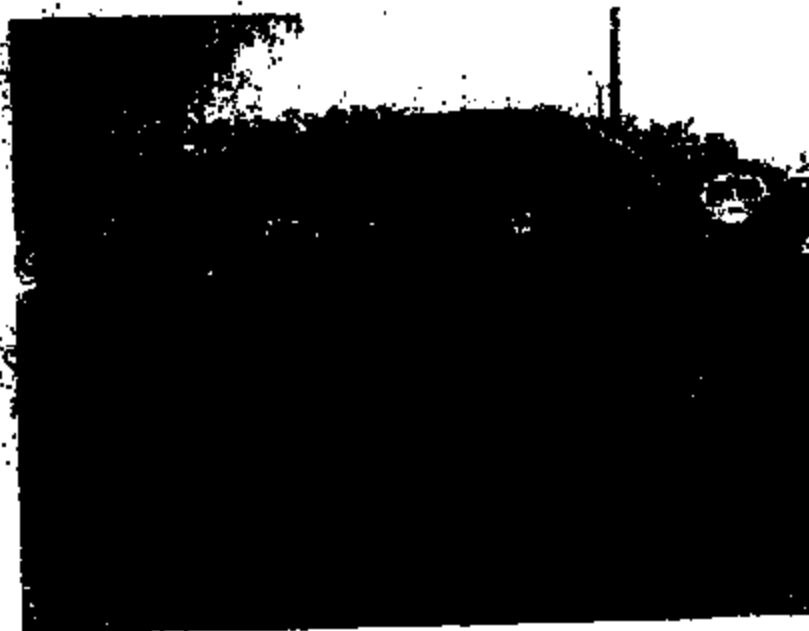
**V. ATTACHMENTS**

**B. PHOTOGRAPHS**

1. View showing the front of the 2001 Ford Expedition vehicle.



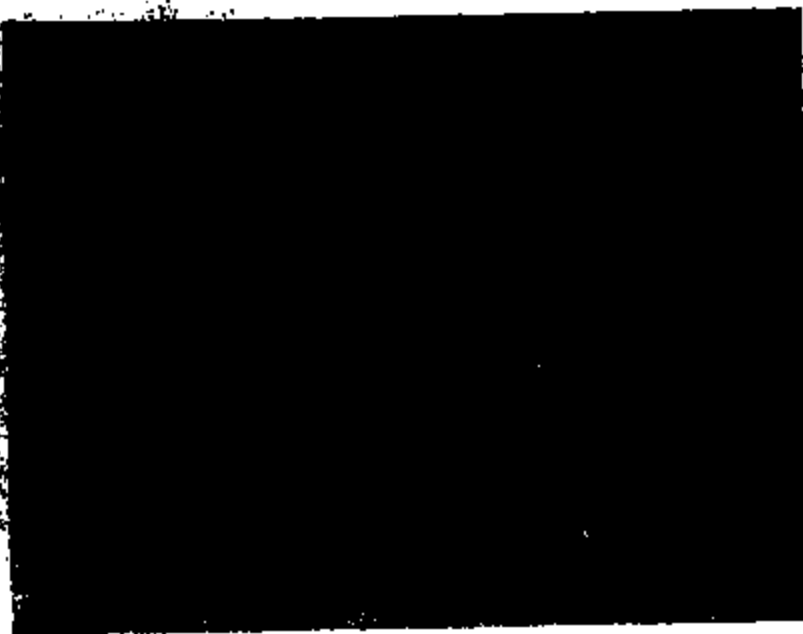
2. Rear view of the vehicle.



3. Right side view of the vehicle.



4. Left side view of the vehicle.



5. Left side view of the vehicle.



6. View showing the right front fender.





PROPERTY ACCOUNTABILITY  
ASSIGNMENT / TRANSFER AUTHORIZATION

DATE PRINTED: 12/ 5/2003

ASSIGNMENT AND/OR TRANSFER HAS BEEN EFFECTED AS INDICATED BELOW

Transferred From NWS230 BREON BRANCH

Date Transferred: 12/ 5/2003

Transferred To: NPO255. HATTI BAKER

BarCode	RoomNumber	EmployeeID	Organization	AssetType	Manufacturer	ModelNumber	Serial Number	Cost
C1201	6119	PROPERTY ROOM	NPO-255	CPU	DELL	DFW	6SK76	\$1,967.00
C3638	6119	PROPERTY ROOM	NPO-255	CPU	DELL	MMP	HMQZV	\$1,871.00

12-05-03  
Breon; 148  
for your signature,  
I'll send back  
original checks  
What is up with  
DOT # C2888-NO transfer  
slip

DEC - 5

/P

I HAVE RECEIVED THE ITEM(S) LISTED AND ACCEPT RESPONSIBILITY OF THIS PRO

Breon Branch  
APPROVING PROPERTY OFFICES

DATE SIGNED: 12-23-03

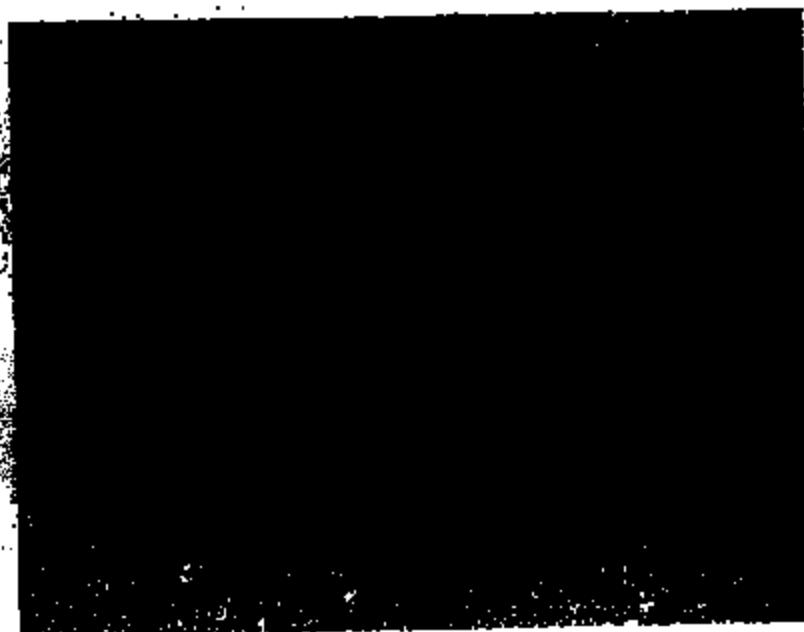
H. Baker  
PROPERTY CUSTODIAN OR REPRESENTATIVE (ONLY)

DATE SIGNED: 12/5/03

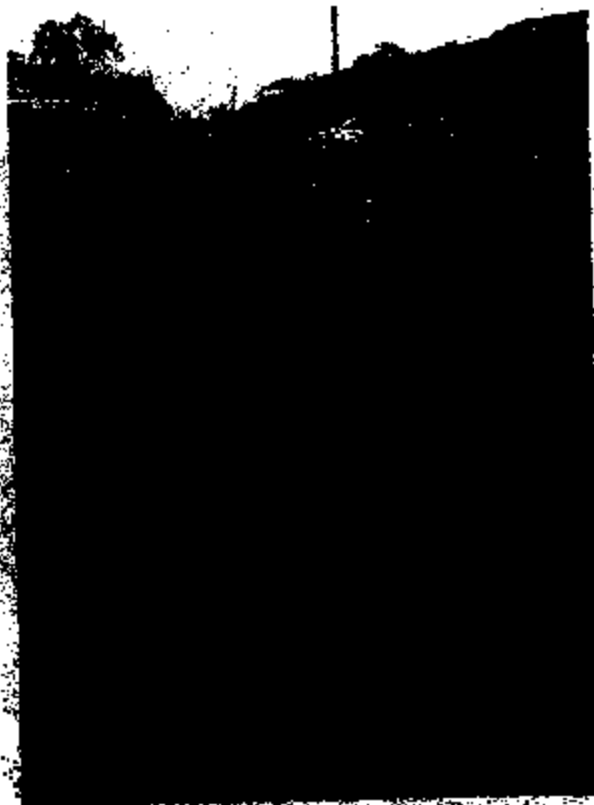
9. View showing the left front fender...



10. View showing the left front tire and wheel remains.



11. View showing the left front door panel of the vehicle.



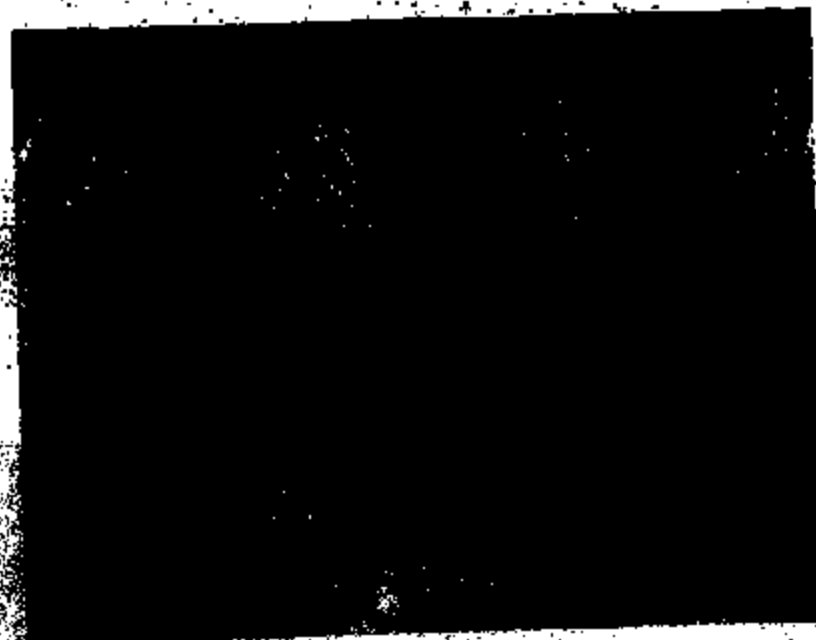
12. View showing the left rear door panel.



13. View showing the roof panel.



14. Right to left view of the rear passenger area.



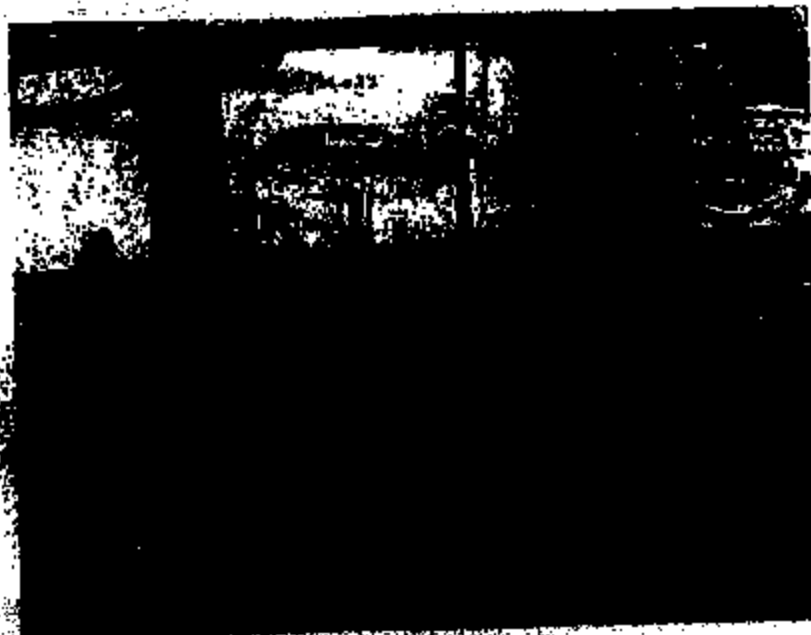
15. Left to right view of the rear passenger area.



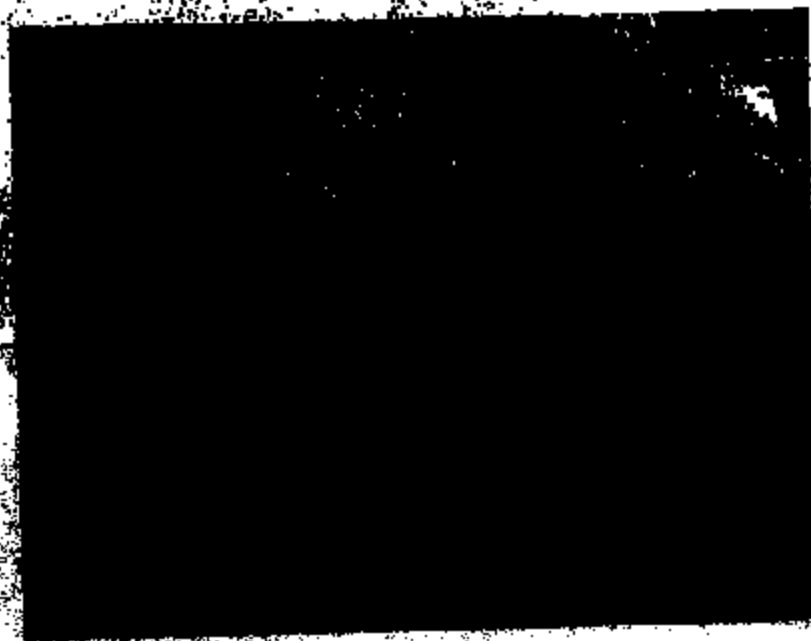
16. Right to left view of the center passenger area.



17. Left to right view of the center passenger area.



18. Right to left view of the front passenger area.

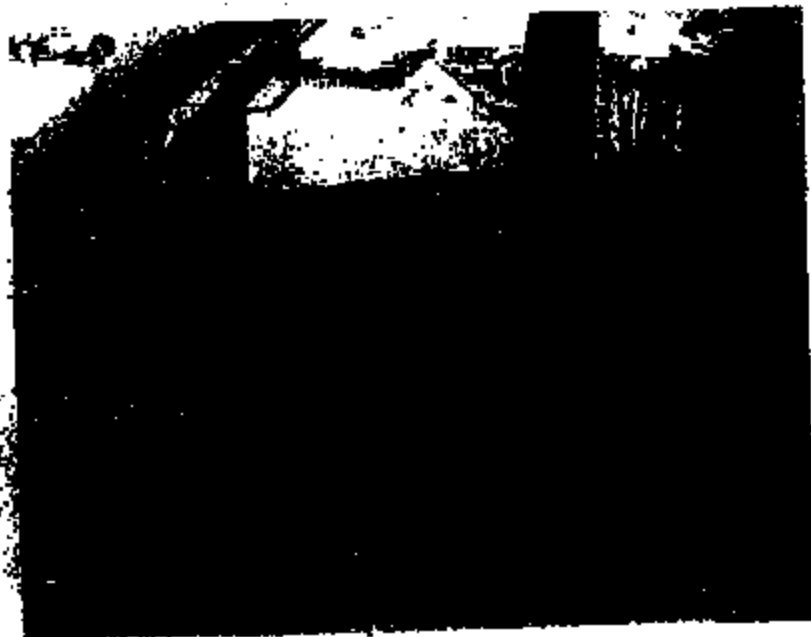


1300412090136326

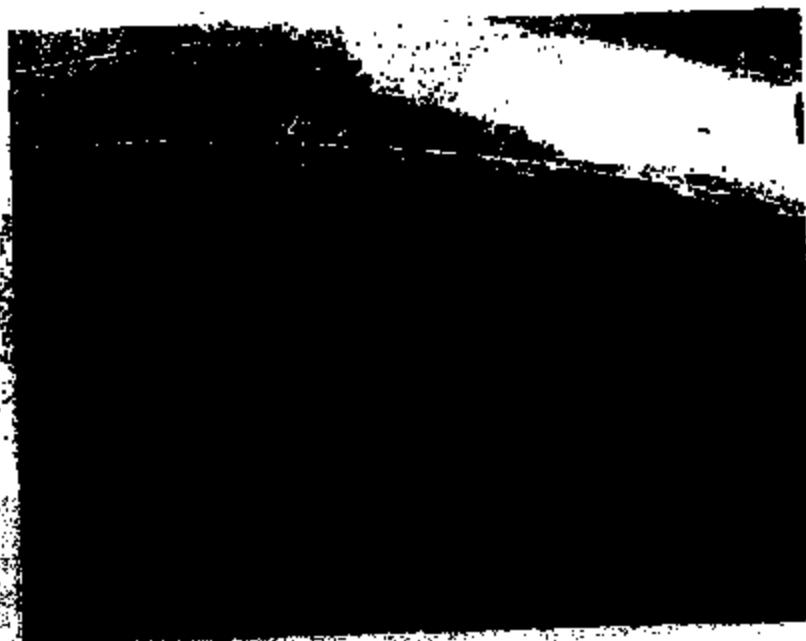


1300412090136326

19. Left to right view of the front passenger compartment.

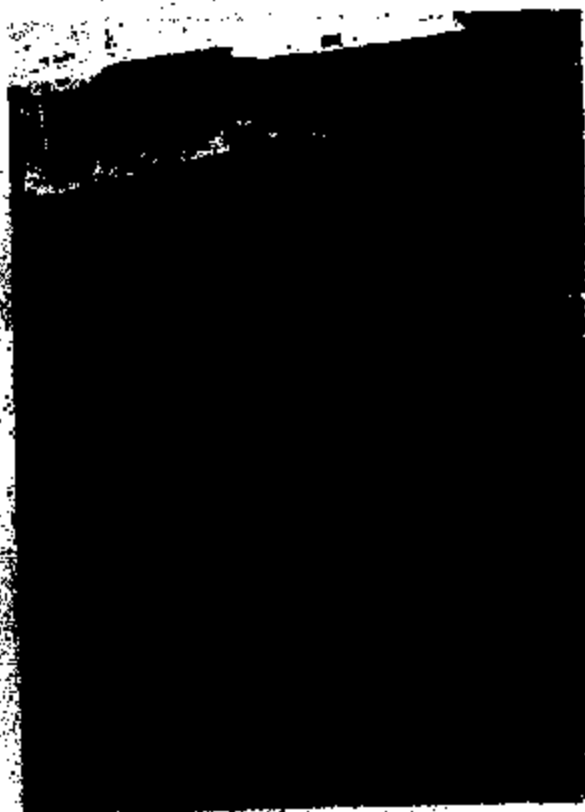


20. Overview of the dash.

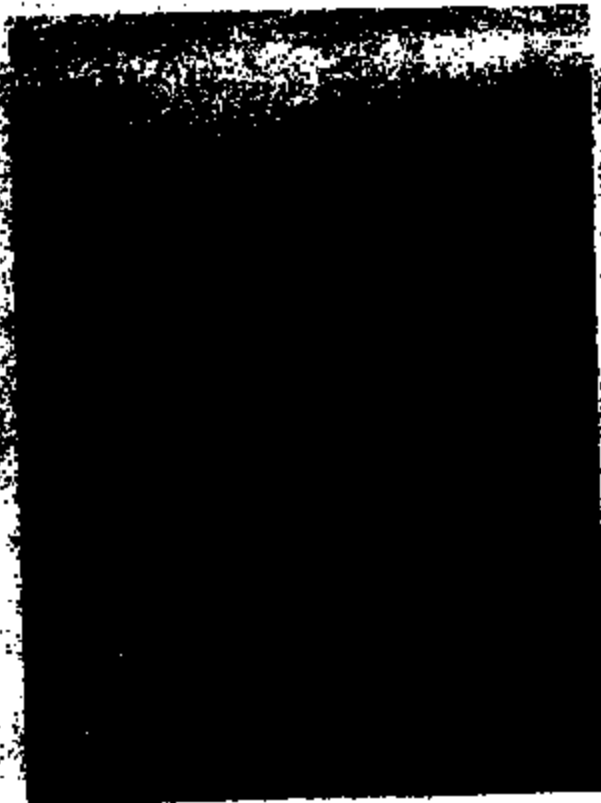




21. View showing the right third  
of the dash.



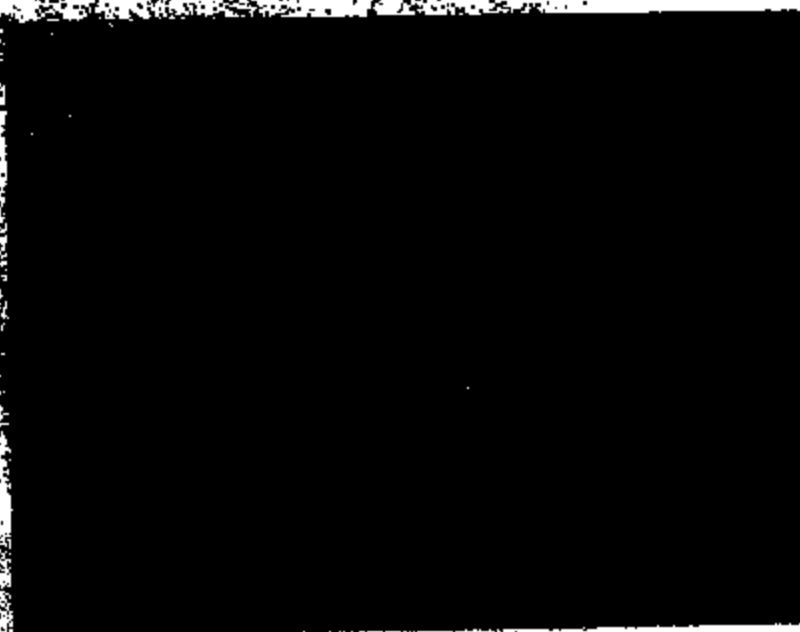
22. View showing the center third  
of the dash.



23. View showing the left third of the dash.



24. Overview of the engine compartment.



25. View of the front half of the  
engine compartment.



26. View of the rear half of the  
engine compartment.



## ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
5/9/2002 CLOSED	[REDACTED] RECALL/ONP - VEHICLE INVOLVEMENT	1FMRU17W01L [REDACTED] 1595871232	2001 EXPEDITION	03

... 1/1/2005

## All Action Details for Issue

Print

Vlt: 1FMRU17W01 [REDACTED] Year: 2001 Model: EXPEDITION Case: 1595871232  
 Name: [REDACTED] Owner Status: Original WSD: 2001-03-08  
 Symptom: [REDACTED] Primary Phone: [REDACTED]  
 Reason Desc: RECALL/ONP - VEHICLE INVOLVEMENT Secondary Phone: [REDACTED]  
 Issue Type: 03 CONCERN Issue Status: CLOSED  
 Initial Customer Contact:

Action: ADVISE CUST OF FSA/CSP; DOCUMENT CAMPAIGN NUMBER  
 Dealer: 04212 NORTH CENTRAL FORD Origin Desc: US INQUIRY CASE BASE  
 Odometer: 27000 MI Comm Type: PHONE  
 Analyst Name: KIM FREELAND Analyst: KFREELAN  
 Action Date: 05/03/2002 Action Time: 16:32:41.841 Action Date: Yes

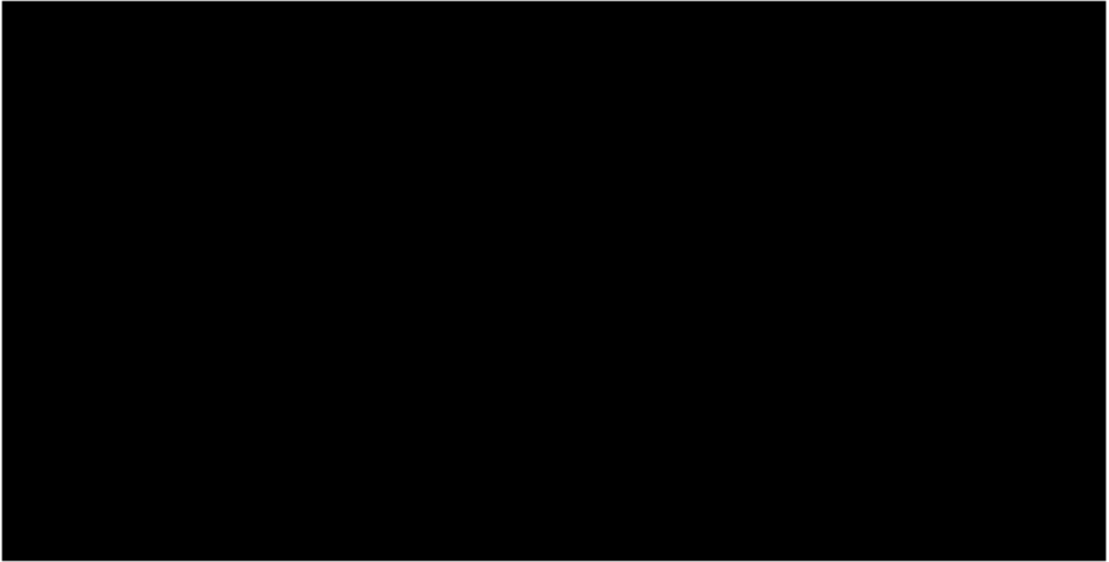
Comments CUSTOMER SAYS: SEAT BELT BUCKLE PROGRAM. CUSTOMER HAS BEEN RECEIVING LETTERS WANTS TO KNOW IF THIS IS A PROGRAM OR A SAFETY RECALL? PER CUSTOMER, DEALER SAYS: CAPTAINS CHAIRS CAC ADVISED: - PLEASE ADVISE CUSTOMER OF THE INFORMATION FOUND IN THE THE CUSTOMER LETTER OR THE SEARCH ENGINE Q&A. - PLEASE DOCUMENT ANY INFORMATION PROVIDED TO CUSTOMER. ADVISED CUSTOMER SHE DOES HAVE A SAFETY RECALL AND NEEDS TO BE LOOKED AT, AT ONCE. CUSTOMER GOING TO CONTACT THE DEALERSHIP.  
 INFERENCE CASE ID: 1039

Data Element Name	Data Value
FSA/CSP CAMPAIGN NUMBER	01S21

Action: FORD COVERED REPAIR MADE - RECALL  
 Dealer: 04212 NORTH CENTRAL FORD Origin Desc: DEALER  
 Odometer: 27000 MI Comm Type: VISIT  
 Analyst Name: CRAIG BOWEN Analyst: C-BOWEN5  
 Action Date: 05/08/2002 Action Time: 15:48:33.572 Action Date: No

Comments CUSTOMER CAME IN FOR RECALL WORK-SEATBELT WAS INSPECTED-REPLACEMENT WAS NOT NEED-CB

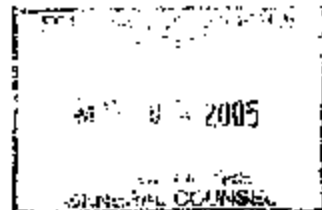
1/7/2005



**VERNON & DURAY, L.L.P.**

*Attorneys at Law*  
Lynn Professional Building  
6820 Walling Lane  
Dallas, Texas 75231

Ph: (214)221-3700 Fax: (214)221-3701



MICHAEL P. DURAY

mduray@vnt.com

April 21, 2005

Via Certified Mail No. 7004 2890 0001 7665 1819  
Ford Motor Company  
P.O. Box 6251  
Dearborn, Michigan 48121-6251

*gm* *New*

and

Via Certified Mail No. 7004 2890 0001 7664 7508  
Bob Tomes Ford, Inc.  
P.O. Box 596  
McKinney, TX 75069-0596

Re: [REDACTED]  
2001 Ford Model F150 Pickup  
Date of Loss: 9/23/03  
Our File No: EMC10,256

Dear Sirs:

The undersigned attorney represents [REDACTED] and his insurance company. [REDACTED] purchased a 2001 Ford Model F150 Pickup Truck from Bob Tomes Ford, Inc. On September 29, 2003 [REDACTED] truck caught fire while parked in his driveway and the ignition was turned off. An independent fire expert investigated the fire and determined that the fire was caused by a defective brake pressure switch, also known as the speed control deactivation switch. It has recently come to my clients' attention that Ford has recalled these trucks because of the defective speed control deactivation switches. I have attached a copy of the expert's report for your review and photographs of the damaged vehicle. The reasonable market value of [REDACTED] vehicle at the time the fire occurred was at least \$25,920.16. My clients' appraiser determined that the vehicle was a total loss. The vehicle was sold for salvage due to the extent of the damage for the sum of \$5,721.00, which makes my clients' net loss \$20,199.16, see attached documentation. [REDACTED] has also incurred the following damages related to the fire in his truck:

Pressure wash driveway to clean up after fire:	\$250
Lost two work days (16 hours @ \$100 per hour):	\$1600

16 CD's inside truck ( \$15 each);

\$240

Total

\$2090

\_\_\_\_\_ hereby makes demand for payment in the amount of \$22,289.16. Your action in selling this vehicle with a faulty speed control deactivation switch constitutes violations of the Texas Deceptive Trade Practices Act, Section 17.46(5) and (7) of the Texas Business and Commerce Code. If payment is not made within sixty (60) days from the date of this letter and the Court or Jury finds that you did in fact violate the Texas Deceptive Trade Practices Act, you may be liable for three times the amount of economic damages incurred by my client, damages for my client's mental anguish and reasonable and necessary attorney's fees.

Please contact me if you need additional information to process this claim or would like to discuss this matter in greater detail.

Very truly yours,



Michael P. Duray

MPD/jt

Enclosures

cc: William H. McFerrin



Insured: [REDACTED]  
UIS File No.: TX01-05562

### ASSIGNMENT

The assignment was received on October 8, 2003, and the investigation commenced the following day. Instructions were to conduct a vehicle examination.

### PRELIMINARY FINDINGS

All known facts and circumstances support the cause of this fire as accidental due to overheating and failure of the brake pressure switch, which was in the engine compartment of the vehicle.

### VEHICLE EXAMINATION

A vehicle examination was conducted on the storage lot of the Copart Auto Stores at 505 Idlewild, Grand Prairie, Texas.

Rinkus Fire Investigator Buddy Jenkins was present in the immediate areas of inspection. He was conducting a fire loss on the adjoining parking space involving a separate vehicle. He did observe much of the actions of this investigator.

No adverse conditions were encountered, and a thorough review of the fire loss was conducted.

The vehicle involved in this fire loss was a 2001 Ford F-150 crew cab pickup bearing Texas License Plate Number [REDACTED] and Vehicle Identification Number 1FTRW08L11[REDACTED].

The vehicle appeared intact and not stripped of any equipment prior to or during this fire's occurrence. The hood and front windshield area was secured by a clear, plastic covering preventing any rain, moisture, or dust to enter the damaged portions of this vehicle.

Fire damage and patterns of flame spread revealed that burning first occurred in the left central side of the engine compartment of the vehicle. At this location, the brake pressure switch manifested focused heat damage and evidence of internal heating. All heat and flame spread from this point laterally over most of the left side of the engine consuming wire insulation, plastic moldings, and other combustible materials. Flame spread laterally into the left side portion of the driver's side dash when extinguishment of the fire occurred. The remaining portions of the interior of the vehicle did not manifest any heat or flame damage. Minor sooting was noticed over the windows and interior surfaces.

Careful review of the brake pressure switch manifested focused heating and damage not associated with invasive heat or secondary flame spread from another source. Careful review of the engine area did not reveal any other possible heat or ignition source for this fire.

All known facts and circumstances support the cause of this fire as accidental due to failure of the brake pressure switch. No other possible reason or cause was found.

Insured: [REDACTED]  
UIS File No.: TX01-03562

### INVESTIGATION

[REDACTED] stated that on July 31, 2003, the vehicle was taken into the Service Department for a window repair involving the right rear door assembly. He further stated that the customer had replaced several fuses that were immediately blown serving this circuit.

[REDACTED] went on to say that all systems and components checked out at the time of the completion of this work on July 31, 2003.

A copy of the work invoice was obtained by this investigator and is included as an Exhibit in this report.

### COMMENTS

Careful review of the Prestige Ford Work Order No. F0CS309547 does not manifest any work involving the brake pressure switch or associated wiring. Pursuant to your instructions by telephone, no additional work will be conducted on this assignment at this time; and our file will be placed inactive. Please telephone us if you have any additional questions or further assignment requests.

### EXHIBITS

1. Vehicle Inspection Report
2. Prestige Ford Work Invoice
3. 36 color photographs with Photograph Explanation Sheet
4. Photograph Negatives mailed under separate cover

Richard Taylor  
Special Investigator  
Unified Investigations & Sciences, Inc.  
469-698-0035 or 1-800-615-4840

**PHOTOGRAPH 1:**  
View of the front end of the vehicle.



**PHOTOGRAPH 2:**  
View of the left front of the vehicle.



**PHOTOGRAPH 3:**  
View of the left rear of the vehicle.



**PHOTOGRAPH 4:**  
View of the right rear of the vehicle.



**PHOTOGRAPH 5:**  
View of the right front of the vehicle.



**PHOTOGRAPH 6:**  
View of the hood and the hole burned through the hood.



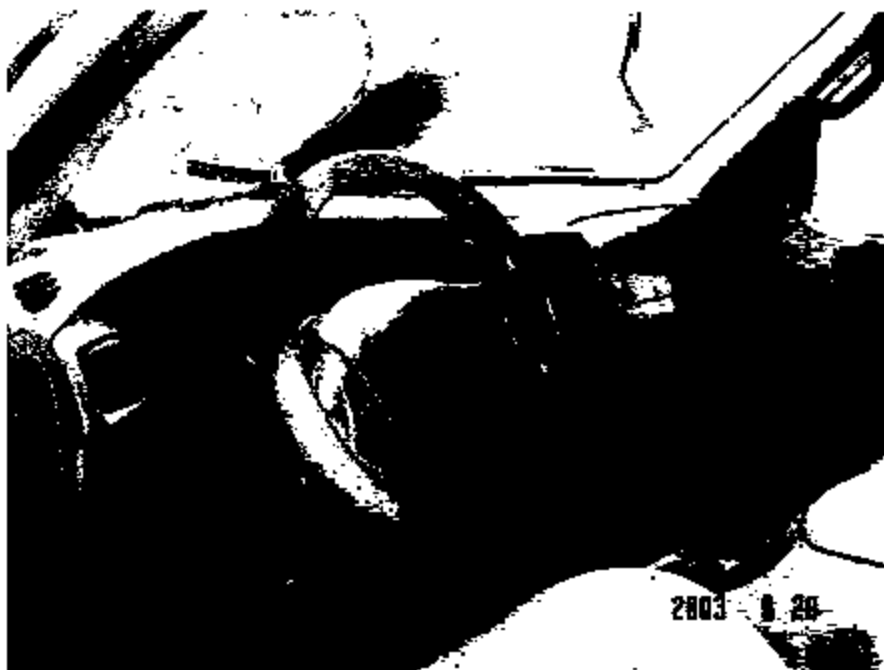
**PHOTOGRAPH 7:**

View of the left front fender and tire area.



**PHOTOGRAPH 8:**

View of the front dashboard area from the left side.



**PHOTOGRAPH 9:**

View of the front dashboard area from the right side.



**PHOTOGRAPH 10:**

View of the floor area under the dashboard on the left side.



**PHOTOGRAPH 11:**

View of the engine compartment and underside of the hood.



**PHOTOGRAPH 12:**

View of the underside of the hood.





**PHOTOGRAPH 13:**

View of the engine compartment and point of fire origin (arrow).



**PHOTOGRAPH 14:**

View of the area of fire origin in the left rear area of the engine compartment.



**PHOTOGRAPH 15:**  
View of the vehicle battery.



**PHOTOGRAPH 16:**  
View of a portion of the vehicle wiring harness.



**PHOTOGRAPH 17:**

View of the power distribution center remains.



**PHOTOGRAPH 18:**

View of the master cylinder and brake pressure switch (arrow).



**PHOTOGRAPH 19:**

Close-up of the brake pressure switch where the fire originated.



**PHOTOGRAPH 20:**

View of the In-dash fuse panel.



## ISSUE LIST

Last Handling Date/ Issue Status	Name/ Reason Desc	Vin/ Case No.	Model Year and Vehicle Line	Issue Type
6/11/2005 CLOSED	[REDACTED] LEGAL - OTHER ATTORNEY DEMAND	1FTRW08L11K [REDACTED] 499202262	2001 F-SERIES	07
11/5/2003 CLOSED	[REDACTED] RECALL/ONP - VEHICLE INVOLVEMENT	1FTRW08L11K [REDACTED] 499202262	2001 F-SERIES	02
8/23/2002 CLOSED	[REDACTED] PROD/COMP DUR/PERF - VEHICLE QUALITY	1FTRW08L11K [REDACTED] 499202262	2001 F-SERIES	02
8/20/2002 CLOSED	[REDACTED] PROD/COMP DUR/PERF - VEHICLE QUALITY	1FTRW08L11K [REDACTED] 499202262	2001 F-SERIES	02
8/14/2002 CLOSED	[REDACTED] PROD/COMP DUR/PERF - VEHICLE QUALITY	1FTRW08L11K [REDACTED] 499202262	2001 F-SERIES	02

E085-005-LC-0408

5/16/2005

## All Action Details for Issue

Print

VIN: 1ETRW08111K [REDACTED] Year: 2001 Model: F-SERIES Case: 499202262  
Name: [REDACTED] Owner Status: Original WSD: 2000-11-17  
Symptom Desc: FIRE/SMOKE VISIBLE FLAME Primary Phone: [REDACTED]  
Reason Desc: LEGAL - OTHER ATTORNEY DEMAND Secondary Phone: [REDACTED]  
Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND  
Dealer: 02415 PRESTIGE FORD Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION-FD  
Odometer: 1 MI Comm Type: FAX  
Analyst Name: LEICH, CHERIE Analyst: CLEICH  
Action Date: 05/09/2005 Action Time: 11:29:17.861 Action Data: Yes

Comments \*\*\*\*\*ATTORNEY DEMAND\*\*\*\*\* FAX RECEIVED 4-28-05. ATTORNEY ALLEGES CLIENT'S VEHICLE CAUGHT FIRE ON 9-29-03 WHILE PARKED IN HIS DRIVEWAY. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Data Element Name	Data Value
NAME OF LAW FIRM	VERNON & DURAY ATTORNEYS AT LAW
ATTORNEY NAME	MICHAEL P. DURAY
ATTORNEY PHONE NUMBER	2142213700
ANALYST ID	MPAWELEK

Action: SEND ACKNOWLEDGEMENT LETTER TO ATTORNEY  
Dealer: 02415 PRESTIGE FORD Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Odometer: 1 MI Comm Type: FAX  
Analyst Name: PAWELEK, MAUREEN Analyst: MPAWELEK  
(M.L.)  
Action Date: 05/11/2005 Action Time: 14:19:39.849 Action Data: No

Comments VEHICLE IS NO LONGER AVAILABLE FOR INSPECTION AS IT WAS SOLD FOR SALVAGE, ACCORDING TO ATTORNEY LETTER. SENDING LETTER ADVISING THAT FORD CANNOT BE OF ASSISTANCE IN THIS MATTER.

Action: CLOSING COMMENTS - DENIAL - BASED ON LITIGATION PREVENTION REVIEW  
Dealer: 02415 PRESTIGE FORD Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION  
Odometer: 1 MI Comm Type: FAX  
Analyst Name: PAWELEK, MAUREEN Analyst: MPAWELEK  
(M.L.)  
Action Date: 05/11/2005 Action Time: 14:20:06.421 Action Data: No

Comments NO FURTHER ACTION.

E985-005-LC-0489

## All Action Details for Issue

Print

VIN: 1ETRW08L13 [REDACTED] Year: 2001 Model: F-SERIES Case: 499202262  
Name: [REDACTED] Owner Status: Original WSD: 2000-11-17  
Symptom Desc: GENERAL INQUIRIES REQUEST/ NON-VEHICLE RELATED Primary Phone: [REDACTED]  
Reason Desc: RECALL/ONP - VEHICLE INVOLVEMENT Secondary Phone: [REDACTED]  
Issue Type: 02 INFORMATION Issue Status: CLOSED

Action: ADVISE CUST NO FSA'S AT THIS TIME

Dealer: 02415 PRESTIGE FORD

Origin Desc: US INQUIRY CASE BASE

Odometer: 1 MI

Comm Type: PHONE

Analyst Name: TSULTIM NAWANG

Analyst: TNAWANG

Action Date: 11/05/2003

Action Time: 12.15.54.586

Action Data: No

Comments CUSTOMER SAID; CUST WANTS TO KNOW IF THERE IS ANY RECALL ON THE VEH-CRC ADVISED: VEHICLE IS NOT INVOLVED IN ANY RECALL/CSP AT THIS TIME.

E982-005-10-0410

## AR Action Details for Issue

Print

VIN: 1FTRW08L11K [REDACTED] Year: 2001 Model: F-SERIES Case: 499202262  
Name: [REDACTED] Owner Status: Original WSD: 2000-11-17  
Symptom Desc: Primary Phone: [REDACTED]  
Reason Desc: PROD/COMP DUR/PERF - VEHICLE QUALITY Secondary Phone: [REDACTED]  
Issue Type: 02 INFORMATION Issue Status: CLOSED

## Action: SUPPORT DEALER'S/REGION'S DECISION

Dealer: 02415 PRESTIGE FORD

Origin Desc: US CONCERN CASE BASE

Odometer: 34000 MI

Comm Type: PHONE

Analyst Name: MULZAC, WAYNE

Analyst: WMULZAC

Action Date: 08/23/2002

Action Time: 12:37:23.381

Action Data: No

Comments CUSTOMER SAYS: - CALLING TO FIND OUT THE DECISION - WILL NEVER BUY ANOTHER FORD AGAIN SINCE FORD WILL NOT COVER THE ENTIRE SITUATION - HAVE BEEN A FORD CUST BUT WILL SWITCH TO CHEVY BECAUSE OF THIS PER CUSTOMER, DEALER SAYS: - NONE CAC ADVISED: - INFORMATION DOCUMENTED - FORD SUPPORTS DLR/REGION DECISION INFERENCE CASE ID: 1616

## Action: AS PER TEAM LEADER

Dealer: 02415 PRESTIGE FORD

Origin Desc: MANUAL - PHONE CSR

Odometer: 1 MI

Comm Type: PHONE

Analyst Name: YVONNE BROWN

Analyst: YBROWN

Action Date: 08/23/2002

Action Time: 13:48:21.182

Action Data: Yes

Comments CUSTOMER SAYS: NONE PER CUSTOMER, DEALER SAYS: NONE CAC ADVISED: NEXT CSR ADVISED CUST AS TO DECISION NO FURTHER FOLLOWUP

Data Element NameData Value

TEAM LEADER NAME

GEMMA

EPOS-805-LC-0411



## All Action Details for Issue

Print

VIN: 1FTRW08L1	Year: 2001	Model: F-SERIES	Case: 499202282
Name: [REDACTED]	Owner Status: Original	WSD: 2000-11-17	
Symptom Desc: SEATING APPEARANCE/FIT		Primary Phone: [REDACTED]	
Reason Desc: PROD/COMP DUR/PERF - VEHICLE QUALITY		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: ADVISE INFO WILL BE SENT TO DLR; CONTACT CRM  
 Dealer: 02415 PRESTIGE FORD  
 Odometer: 34000 MI  
 Analyst Name: YVONNE BROWN  
 Action Date: 06/19/2002

Comm Type: PHONE  
 Analyst: YBROWN  
 Action Time: 12.10.27.615

Origin Desc: US CONCERN CASE BASE  
 Action Data: No

Comments CUSTOMER SAYS: CUST STATE THAT THERE IS A LOT EXCESSIVE WEAR BOTH IN THE DRIVER AND PASSENGER SIDE LEATHER SEATING CUST WANT FORD TO REPLACE THE PASSENGER SIDE AS WELL BECAUSE THEY ARE WORN AS WELL PER CUSTOMER, DEALER SAYS: THAT FORD ELL ONLY REPLACE THE DRIVER SIDE SEATING CAC ADVISED: - WE RECOMMEND THE REPAIR BE PERFORMED BY A FORD/LM DEALERSHIP - INFORMATION WILL BE SENT TO DLR, CUSTOMER SHOULD CONTACT CRM/SERV MGR OBC TO THE DLRSHIP TO GET FEEDBACK LEAVE NUMBER ON S/M VM TO GET BACK TO ME INFERENCE CASE ID: 4591

Action: OUTBOUND CALL TO DEALER  
 Dealer: 02415 PRESTIGE FORD  
 Odometer: 340500 MI  
 Analyst Name: YVONNE BROWN  
 Action Date: 08/20/2002

Comm Type: PHONE  
 Analyst: YBROWN  
 Action Time: 13.02.50.129

Origin Desc: MANUAL - PHONE CSR  
 Action Data: No

Comments CUSTOMER SAYS: PER CUSTOMER, DEALER SAYS: CAC ADVISED: OBC TO DLRSHIP SPOKE WITH STATE THAT THE DLRSHIP TOOK PICTURE OF THE SEAT AND SEND IT INTO FORD FORD WILL ONLY REPLACE ONE SEAT UNDER THE WARRANTY

Action: OUTBOUND CALL TO FORD/MERCURY CUSTOMER  
 Dealer: 02415 PRESTIGE FORD  
 Odometer: 1 MI  
 Analyst Name: YVONNE BROWN  
 Action Date: 08/20/2002

Comm Type: PHONE  
 Analyst: YBROWN  
 Action Time: 13.46.55.224

Origin Desc: MANUAL - PHONE CSR  
 Action Data: No

Comments CUSTOMER SAYS: PER CUSTOMER, DEALER SAYS: CAC ADVISED: OBC TO CUST LEAVE MESSAGE ON CUST V/M \*\*\*\*\* IF CUST CALL IN PLEASE ADVISED UST AS PER CONVERSATION WITH S/M, TUFFY FORD WILL BE ONLY REPLACING ONE SEATING UNDER WARRANTY DLRSHIP DID SENT PICTURE OF CUST CONCERN TO FORD WAS ADVISED THAT ONLY ONE SEAT WILL BE REPLACING UNDER THE WARRANTY

E905-005-LO-0412

## All Action Details for Issue

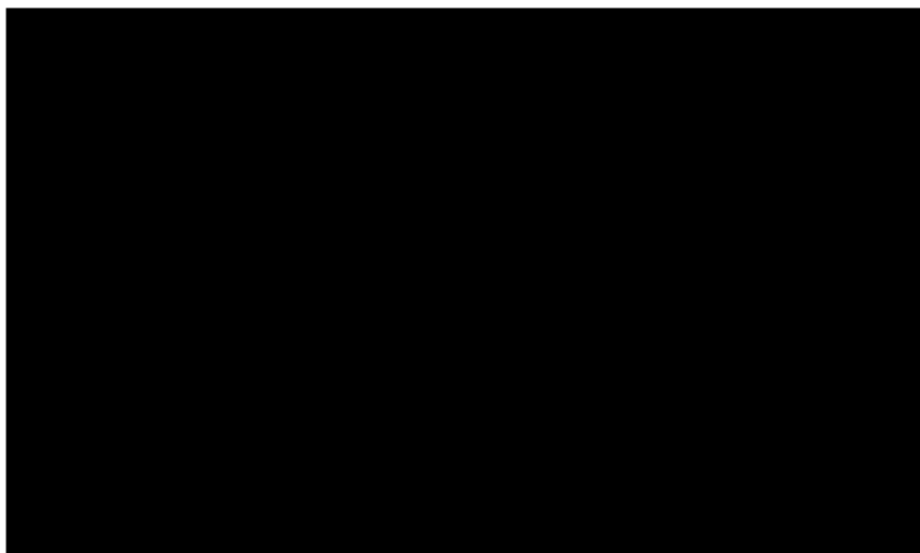
Print

VIN: 1FTRW08L11K	Year: 2001	Model: F-SERIES	Case: 489202282
Name: [REDACTED]	Owner Status: Original	WSD: 2000-11-17	
Symptom Desc: SEATING APPEARANCE/RT CUSHION-BOTTOM		Primary Phone: [REDACTED]	
Reason Desc: PROD/COMP DUR/PERF - VEHICLE QUALITY		Secondary Phone: [REDACTED]	
Issue Type: 02 INFORMATION	Issue Status: CLOSED		

Action: ADVISE INFO WILL BE SENT TO DLR; CONTACT CRM	
Dealer: 02415 PRESTIGE FORD	Origin Desc: US CONCERN CASE BASE
Odometer: 34000 MI	Comm Type: PHONE
Analyst Name: TERRELL MURRAY	Analyst: TMURRAY
Action Date: 06/14/2002	Action Time: 13:50:14.083
	Action Data: No

Comments CUSTOMER SAYS: PASSENGER AND DRIVERS SEAT LEATHER IS WEARING OUT - THEY APPROVED THE REPLACEMENT JUST FOR THE PASSENGERS CUSHION AND NOT THE BACK REST - CUST IS SEEKING BOTH THE PASSENGER AND DRIVERS BOT CUSHION AND BACK REST TO BE REPLACED. PER CUSTOMER, DEALER SAYS: - APPROVE 1 CUSHION FOR THE PASSENGER - DAVID. CAC ADVISED: - WE RECOMMEND THE REPAIR BE PERFORMED BY A FORD/LM DEALERSHIP - INFORMATION WILL BE SENT TO DLR, CUSTOMER SHOULD CONTACT CRM/SERV MGR - ADVISED CUST THAT I WILL FOLLOW UP WITH HIM TOMORROW INFERENCE CASE ID: 4591

E005-089-LO-0413



**COPY** ANTI-FREENEY

Cause No. 01-2256

**Plaintiff,**

**VS.**

**FORD MOTOR COMPANY,**  
**Defendant.**

[illegible]

IN THE DISTRICT COURT

**DALLAS COUNTY, TEXAS**

1918 JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW, [REDACTED] hereinafter referred to as "Plaintiff", and complains of FORD MOTOR COMPANY, a Delaware Corporation, hereinafter referred to as "Defendant", and for cause of action would respectfully show the Court as follows:

## L DISCOVERY

Discovery in this suit is intended to be conducted under Level One of the Texas Rules of Civil Procedure unless otherwise ordered by the Court.

## II. PARTIES, VENUE AND JURISDICTION

1. Plaintiff is an individual residing in Grand Prairie, Dallas County, Texas.
2. Defendant, **FORD MOTOR COMPANY**, is a Delaware Corporation doing business in the State of Texas and may be duly served with citation by serving its registered agent, *CT Corporation Systems*, 350 N. St. Paul Street, Dallas, Dallas County, Texas 75201.
4. Venue of this suit is proper in Dallas County, Texas pursuant to Section 15.002 of the Texas Civil Practice and Remedies Code for the reason that all or a substantial part of the events or omissions giving rise to the claims made herein occurred in Dallas County.
5. The Court has jurisdiction over Defendant for the reason that Defendant is qualified to do business in the State of Texas and, at the time this cause of action accrued, was conducting business in this state. The Court has jurisdiction over the controversy for the reason that the damages

sued for are within the jurisdictional limits of this Court.

### **III.**

This is a products liability cause of action which arises from the design, manufacture, and marketing defects of a 1996 model year Ford F150 (hereinafter referred to as "Vehicle"), bearing vehicle identification number 1FTEF15TL [REDACTED], manufactured by Defendant. The Vehicle was ultimately purchased by Plaintiff.

At all times relevant to this matter, Defendant was engaged in the business of designing, manufacturing, and distributing the Vehicle. Defendant marketed the Vehicle to the general public, throughout the United States, as well as within the State of Texas.

### **IV. NOT TO BE DISSEMINATED TO THE JURY**

A portion of this lawsuit represents an insurance subrogation matter. Plaintiff would show that State Farm Mutual Auto Insurance Company, an insurance company doing business in the State of Texas, has paid Plaintiff for a portion of the damages which he incurred and which resulted from the events described herein. Such being the case, State Farm is entitled to seek recovery for such damages against the Defendant, along with Plaintiff, as a real party in interest. Plaintiff has subrogated his rights to State Farm Mutual Auto Insurance Company to the extent of such benefits paid in this matter.

### **V. Factual Background**

On or about August 1, 1999 Plaintiff's vehicle was damaged by fire.

Upon investigation, it has been determined that the fire originated in the left rear portion of the engine compartment. More specifically, the fire was caused by electrical failure within the brake pressure switch or the brake pressure switch wiring, which ultimately ignited the insulation of the conductors as well as igniting the main portion of the Vehicle's wiring harness. The Vehicle had been parked, without being started, from Friday at approximately 6:30 p.m. until approximately 10:45 a.m. when a neighbor knocked on Plaintiff's door and informed him that the Vehicle was on fire.

Immediately upon discovering the fire, the Fire Department was dispatched and eventually extinguished the fire.

By way of background, [REDACTED] had purchased the Vehicle new from Lee Jarmon Ford in October, 1996. At the time of its purchase, the Vehicle had zero (0) miles. At the time of the fire, the Vehicle had been driven approximately 100,000 to 103,000 miles.

### **VI. CAUSES OF ACTION**

#### **Count One -- Strict Liability**

Plaintiff incorporates by reference the foregoing paragraphs the same as if fully set forth herein.

Defendant FORD MOTOR COMPANY is strictly liable to Plaintiff for designing, manufacturing, marketing, and placing into the stream of commerce a vehicle which was unreasonably dangerous for its foreseeable user at the time it left the control of Defendant. The Vehicle contained a design, manufacture, and/or marketing defect which was the producing and proximate cause of the fire.

The Vehicle was defective and unsafe for its intended purpose at the time it left the Defendant's control and was placed into the stream of commerce by Defendant FORD MOTOR COMPANY.

Based on the foregoing, Plaintiff invokes the Doctrine of Strict Liability.

#### **Count Two -- Negligence**

Plaintiff incorporates by reference the foregoing paragraphs the same as if fully set forth herein.

Defendant FORD MOTOR COMPANY was negligent in the design, manufacture and marketing of the product in question. Defendant knew, or in the exercise of ordinary care, should have known, that the Vehicle was defective and unreasonably dangerous to those persons likely to use the product for the purpose and in the manner for which it was intended to be used. Defendant was negligent in the particulars set forth in this and the preceding paragraphs and such negligence was a proximate cause of the fire.

FORD MOTOR COMPANY owed Plaintiff a duty of reasonable care when it designed,

manufactured and marketed the Vehicle. Defendant violated its duty and was negligent in the particulars set forth above.

Based on the foregoing, Plaintiff alleges that the damages he suffered were a direct and proximate result of the defective design and/or manufacture of the Vehicle which created an unreasonable danger to consumers, namely Plaintiff.

#### **Count Three – Breach of Express and Implied Warranties**

Plaintiff incorporates by reference the foregoing paragraphs the same as if fully set forth herein.

Defendant FORD MOTOR COMPANY, by and through the sale of the Vehicle, held out to the general public and to Plaintiff specifically, that its vehicles would conform with the qualities of same or similar vehicles and was fit for the purposes for which it was intended.

Plaintiff made use of the Vehicle as alleged herein, and relied on the express and implied warranties. Contrary to these warranties, the Vehicle was not fit for its intended use rendering it unreasonably dangerous.

Defendant's breach of warranties rendered the Vehicle unreasonably dangerous and was a proximate and producing cause of the fire and the resulting damage suffered by Plaintiff.

#### **VII. RES IPSA LOQUITUR**

Plaintiff cannot more specifically allege the acts of negligent design and manufacture on the part of Defendant FORD MOTOR COMPANY for the reason that facts in that regard are peculiarly within the knowledge of Defendant.

In this connection, Plaintiff will show that the character of the occurrence giving rise to this litigation is such that it would not have happened in the absence of negligence, and that the design and manufacture of the Vehicle was within the exclusive control of Defendant at the time the negligence probably occurred. Plaintiff has no means of ascertaining the method or manner in which the Vehicle was designed, manufactured, and/or tested.

In the alternative, and in the event Plaintiff is unable to prove specific acts of negligent design, manufacture, testing, and/or marketing, Plaintiff asserts and relies on the doctrine of *Res Ipsa Loquitur*.

### **IX. DAMAGES**

As a result of Defendant FORD MOTOR COMPANY's negligence and its breach of express and implied warranties, Plaintiff sustained damage to his vehicle in at least the amount of \$13,246.05.

After allowing for all just and lawful offsets, payments, and credits, of which there have been none, Defendant continues to be indebted to Plaintiff in the amount of at least \$13,246.05.

Plaintiff hereby asserts his claim for reimbursement of damages sustained by him against Defendant FORD MOTOR COMPANY.

### **PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff, [REDACTED] requests that Defendant FORD MOTOR COMPANY be cited to appear and answer herein, and that on final hearing, Plaintiff recovers:


1. A judgment against Defendant for actual damages in the amounts stated herein or such amount within the minimum jurisdictional limits of this Court;
2. A judgment against Defendant for pre- and post-judgment interest as allowed by law;
3. A judgment against Defendant for all attorney fees;
4. A judgment against Defendant for court costs; and
5. A judgment for such other and further relief, both general and specific, in equity and at law, to which Plaintiff may be justly entitled.



Respectfully submitted,

THE CARPENTER LAW FIRM, P.C.

By: \_\_\_\_\_

  
N. Scott Carpenter  
State Bar No. 00790428

J. David Joyce  
State Bar No. 24025465  
Lakeside Commons  
5045 Lorimar, Suite 280  
Plano, Texas 75093  
(972) 403-1133  
Fax (972) 403-0311

ATTORNEYS FOR PLAINTIFF  
STATE FARM MUTUAL AUTO A/S/O  


SFCHRFMA

## Issue List

04/09/01 12:52:42

==&gt;

FCSD REGION: \_\_\_\_\_ MARKET: \_\_\_\_\_ ISSUE STATUS: \_\_\_\_\_  
P&A CODE: \_\_\_\_\_  
VIN: 1FTEF15Y5T1 \_\_\_\_\_ CASE NUMBER: \_\_\_\_\_  
SALES REGION: \_\_\_\_\_ SALES ZONE: \_\_\_\_\_ ISSUE TYPE: \_\_\_\_\_

A	LAST HND/	Customer Phone Number/	Reason/	Stat/
C	P&A LAO	Trmt Customer Name	Year Model	Type
	08/11/99	_____(H)_____(B)	LEGAL - INSURANCE COMPANY SETT	C
		VLC _____	1996 F-SERIES	02

F1=Help

F2=AddAction

F5=CustomerList

F6=DealerInfo

F7=Prev

F8=Next

F10=IssueDetail

F11=Menu

F12=Return

NO MORE RECORDS AVAILABLE

OGDB079

SFCHIDMA

Issue Detail

04/09/01 12:53:11

VIN: 1FTEF15Y5T1 Year: 1996 Model: F-SERIES  
Owner Status: SUBSEQUENT WSD: 11/02/95 Mileage: 101000  
Name: Hm Ph:  
Trmt: VLC Case: 662582239 Day Ph:  
Symptom:  
Reason: LEGAL - INSURANCE COMPANY SETTLEMENT  
Dealer:  
Issue Type: 02 INFORMATION CAN Court: Legal Issue Type:  
Issue Status: C CLOSED CAN Award: MORSI Contact: Y

A/C DATE Origin Description

08/11/99 CACI38 ADVISE CUST THAT YOUR INSURANCE COMPANY MAY SUBROGATE

F1=Help F2=AddAction F4=ActionDetail F5=DealerInfo  
F7=Prev F8=Next F9=ViewMORSII F11=Menu F12=Return  
NO MORE RECORDS AVAILABLE OGDB079

E005-005-LC-0421

SFCHADMA

Action Detail

04/09/01 12:53:20

==&gt;

VIN: 1FTEF15Y5T1 Year: 1996 Model: F-SERIES  
Owner Status: SUBSEQUENT WSD: 11/02/95  
Name: Hm Ph: [REDACTED]  
Trmt: VLC Case: 662582239 Day Ph: [REDACTED]  
Symptom Desc:  
Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMENT  
Dealer:  
Issue Type: 02 INFORMATION Issue Status: C CLOSED  
Comm Type: PH PHONE Odometer Reading: 101000 MI  
Analyst: CCHRIST CURLINE CHRISTIE Document Number:  
Action Date: 08/11/99 Action Data: Action Time: 18:21:01 EST  
Origin Desc: US CONCERN CASE BASE  
Action Desc: ADVISE CUST THAT YOUR INSURANCE COMPANY MAY SUBROGATE  
Comments: CUSTOMER SAYS: CUST SAYS HIS VEH WAS SITTING FOR 2 AND A H  
ALF DAYS AND HE SAYS VEH CAUGHT ON FIRE HE SAYS THE STARTER  
WAS ENGAGED HE SAYS AND THE VEH WAS MOVING TOWARDS THE HOUSE  
AND WENT UP IN FLAMES CUST SAYS THE TRANSMISSION IS AUTOMA  
TIC CUST SAYS ON AUGUST 1ST AT ABOUT 11:AM CENTRAL STANDARD  
TIME THIS HAPPENED CUST SAYS THE FIRE DEPARTMENT CAME AND  
F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData  
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP  
MORE COMMENTS AVAILABLE

OGDB079

SFCHADMA

Action Detail

04/09/01 12:53:26

==&gt;

VIN: 1FTEF15Y5T1 Year: 1996 Model: F-SERIES  
Owner Status: SUBSEQUENT WSD: 11/02/95  
Name: Hm Ph:  
Trmt: VLC Case: 662582239 Day Ph:  
Symptom Desc:  
Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMENT  
Dealer:  
Issue Type: 02 INFORMATION Issue Status: C CLOSED  
Comm Type: PH PHONE Odometer Reading: 101000 MI  
Analyst: CCHRIST CURLINE CHRISTIE Document Number:  
Action Date: 08/11/99 Action Data: Action Time: 18:21:01 EST  
Origin Desc: US CONCERN CASE BASE  
Action Desc: ADVISE CUST THAT YOUR INSURANCE COMPANY MAY SUBROGATE  
Comments: TIME THIS HAPPENED CUST SAYS THE FIRE DEPARTMENT CAME AND  
SPECULATED THE STARTER SOLENOID WAS THE CONCERN REASON THE  
VEH CAUGHT ON FIRE. CUST SAYS THE VEH WAS TOTALLED AND INSU  
RANCE PAY OUT A CLAIM TO HIM. CUST SAYS HIS INSURANCE CARR  
IER IS STATE FARM. CUST SAYS HE WAS TOLD TO CALL US TO REPO  
RT THE INCIDENT. PER CUSTOMER, DEALER SAYS: NONE CAC ADV

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData  
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP

MORE COMMENTS AVAILABLE

OGDB079

SFCHADMA

Action Detail

04/09/01 12:53:31

==&gt;

VIN: 1FTEF15Y5TL Year: 1996 Model: F-SERIES  
Owner Status: SUBSEQUENT WSD: 11/02/95  
Name: Hm Ph:  
Trmt: VLC Case: 662582239 Day Ph:  
Symptom Desc:  
Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMENT  
Dealer:  
Issue Type: 02 INFORMATION Issue Status: C CLOSED  
Comm Type: PH PHONE Odometer Reading: 101000 MI  
Analyst: CCHRIST CURLINE CHRISTIE Document Number:  
Action Date: 08/11/99 Action Data: Action Time: 18:21:01 EST  
Origin Desc: US CONCERN CASE BASE  
Action Desc: ADVISE CUST THAT YOUR INSURANCE COMPANY MAY SUBROGATE  
Comments: RT THE INCIDENT. PER CUSTOMER, DEALER SAYS: NONE CAC ADV  
ISED: - REFER TO INSURANCE COMPANY (INSURANCE CO. HAS THE R  
IGHT TO SUBROGATE FORD) - UNABLE TO INVESTIGATE VEHICLE AS  
REPAIRS HAVE BEEN PERFORMED INFERENCE CASE ID: 21

F1=Help F2=AddAction F4=PrevAction F5=NextAction F6=ActionData  
F9=PrevComments F10=NextComments F11=Menu F12=Return F13=ESP  
NO MORE COMMENTS AVAILABLE

OGDB079

SFCHMCMMA

Action Detail

04/09/01 15:35:49

=&gt;

VIN: 1FTEF1575TL Year: 1996 Model: F-SERIES  
Name:   
Trmt: Contact: 106463110  
Symptom: 301000,304000  
Reason: 01 ,D100,CL  
Dealer: F52014 LEE JARMON FORD INC  
Issue Type: 6 INFO Issue Status: 2 CLOSED  
Comm Type: M MAIL Odometer Reading: 002840 MI  
Analyst: 6747VM MEMENAS Document Number:  
Action Date: 01/17/96 Action Data: N  
Action Time: 13:27:44 EST  
Origin Desc: GO  
Action Desc:  
Comments: \*\*\*OWNER APPRECIATION CERTIFICATE\*\*  
STEVE FARMER CSM DALLAS  
BRAKES, SUSPENSION  
ATTN: BRIAN HUTH

F1=Help F2=ActionData F4=PrevAction F5=NextAction F9=PrevComments  
F10=NextComments F11=Menu F12=Return F13=PrevContact F14=NextContact  
NO MORE COMMENTS AVAILABLE OGD8079

E935-005-LC-0425

==&gt;

VIN: 1FTEF15Y5T [REDACTED] Year: 1996 Model: F-SERIES  
Name: [REDACTED]  
Trmt: Contact: 106463110  
Symptom: 301000,304000  
Reason: 01 ,D100,CL  
Dealer: F52014 LEE JARMON FORD INC  
Issue Type: 6 INFO Issue Status: 2 CLOSED  
Comm Type: M MAIL Odometer Reading: 002840 MI  
Analyst: 6747VM TREMONTI Document Number:  
Action Date: 02/13/96 Action Data: N  
Action Time: 18:50:19 EST  
Origin Desc: GO  
Action Desc:  
Comments: THIS IS THE CLOSING COMMENT  
CERTIFICATE REDEEMED  
1FTEF14N5S [REDACTED]  
1995 F-SERIES  
DEC 14, 1995  
LEE JARMON FORD S2A014

F1=Help F2=ActionData F4=PrevAction F5=NextAction F9=PrevComments  
F10=NextComments F11=Menu F12=Return F13=PrevContact F14=NextContact  
NO MORE COMMENTS AVAILABLE

OGDB079



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N. SCOTT CARPENTER  
ATTORNEY - MEDIATOR

SHIRLEY M. WEAVER  
LEGAL ASSISTANT

January 11, 2000

VIA CM-RRR NO. 2 467 210 228

Ms. Jennifer Savage - Claims Analyst  
Ford Motor Company  
Parkland Towers West, Suite 400  
Three Parklane Boulevard  
Dearborn, Michigan 48126-2568

Re: Insured: [REDACTED]  
Vehicle: 1996 Ford F150 Pickup (the "Vehicle")  
VIN#: 1FTEF15Y5T [REDACTED]  
Date of Loss: August 1, 1999  
My Client: State Farm Mutual Automobile Insurance  
Our Claim No: 43-R310-320

Dear Ms. Savage:

Please be advised that the undersigned attorney has been retained by State Farm Mutual Automobile Insurance Company ("State Farm") to pursue collection of all damages incurred by State Farm in connection with the fire that damaged the Vehicle.

I am in receipt of your September 2, 1999 letter to Teresa Lapinskie, wherein you requested additional information regarding the above-referenced claim. I have enclosed the information requested.

According to the information I have received, and based upon the conclusions reached in State Farm's investigation, Ford Motor Company is legally responsible for all the damages sustained to the vehicle and incurred by Mr. Pruitt as a result of a fire that damaged their vehicle.

According to the fire investigator's report, it appears that the fire started within the left rear portion of the engine compartment and it was a result of an electrical failure occurring in the brake pressure switch or the wiring to the brake pressure switch.

State Farm has attempted to resolve this matter with you in an amicable and reasonable manner. As of this date, Ford Motor Company has not accepted liability concerning this subrogation

Ford demand letter  
January 11, 2000  
Page 2

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claim. Consequently, I have been retained to pursue this matter, including filing suit, if necessary, in an effort to finally resolve this claim.

State Farm's subrogation claim amounts to \$13,246.05.

If you desire to settle this claim without resort to litigation, please contact me within ten (10) days from your receipt of this letter. Failing such, I have been authorized to file suit.

Very truly yours,

A handwritten signature in black ink, appearing to read "N. Scott Carpenter", with a long, sweeping horizontal line extending to the right.

N. Scott Carpenter

NSC/mw  
c:\250.21\cor\demand.fr

cc: Penn Davis  
State Farm Auto (Via Facsimile)

**REQUESTED INFORMATION FROM BILL PRUITT**

**Answer to Question No. 2:**

The truck had been sitting, without being started or moved, from Friday night at about 8:30 p.m. At approximately 10:45 a.m. Sunday morning, someone was knocking at my front door. When I answered the door, I was told my truck was on fire.

I told my wife to call the fire department and I went out to look at the truck. I then went back into the house to get the keys, unlocked the passenger door, knocked it out of gear, and put on the emergency brake. I proceeded to get out and raise the hood and put water on the engine. The fire department arrived and finished putting out the fire.

The next day, I had the truck towed to Lee Jarmon Ford Dealership, when it had been purchased. I called my insurance company.

**Answer to Question No. 3:**

Please see the attached.

**Answer to Question No. 6:**

Mileage was somewhere in the vicinity of 100,000 and 103,000 miles. I don't know the exact mileage.

**Answer to Question No. 7:**

Photographs are attached to the report by Investigative Consultants, Inc. Color photographs will be provided as soon as they are available.

**Answer to Question No. 10:**

Please see the attached report by Investigative Consultants, Inc.

**Answer to Question No. 11:**

Please see the attached report by Investigative Consultants, Inc.

**Answer to Question No. 12:**

It was totaled.

**Answer to Question No. 13:**

Copart

information

January 11, 2000

Page 2

Answer to Question No. 14:

Please see the attached.

Answer to Question No. 15:

The truck was tuned up at 62,000 miles and the oil was changed every 3,000 to 5,000 miles.

Answer to Question No. 16:

A camper shell was put on the truck bed, a bug shield added to the front on the hood, and a trailer hitch.

Answer to Question No. 24:

The truck was purchased new from Lee Jarmon Ford, in October of 1996.

ER95-005-LC-0430

# COPY

CARROLLTON  
AUG 17 1999  
SERVICE CENTER

RPT# PAGE NO.0001 FBJC FAD2 08-13-1999 14:23

FDID: DM714 INCIDENT: 99005748 Grand Prairie Fire Dept.  
EXP NO.: 000

INC-DATE: 08-01-1999

VERSION: ORIGINAL

## SECTION A - COMPLETE FOR ALL INCIDENTS

FDID: DM714 INCIDENT: 99005748 EXP NO.: 000 INC-DATE: 08-01-1999 RPT: SUN  
TIME BUSP:10:51:35 TIME ARRIV:10:55:49 END TIME: 11:05:21 AFD DAYS: 0

PRD SIX: Vehicle fire - 13  
ACTION TAKEN: 3 - 3 MUTUAL AID: No Mutual Aid received or given. - 0  
FIXED PROP USE: 411 - 411 ISM FACTOR: Short circuit, ground fault. - 54

INCIDENT ADDRESS: [REDACTED] ZIP CODE: [REDACTED]  
PHONE: [REDACTED] ROOM/APT: [REDACTED] OCCF NAME: [REDACTED]

OWNER NAME: [REDACTED] PHONE: [REDACTED]  
OWNER ADDR: [REDACTED] ST: TX ZIP: [REDACTED]

METHOD ALARM: [REDACTED] NO. ALARM: [REDACTED]

STARTING: 12 ENGINE: 3 TRUCK: 1 OTHER: 2

## SECTION B - COMPLETE IF CASUALTY

FIRE INJ: 0 FIRE FAT: 0 CIV INJ: 0 CIV FAT: 0

## SECTION C - COMPLETE FOR ALL FIRE

COMPLEX: Residential dwelling (one and two) - 41 HOB TYPE: Automobile - 11  
AREA ORIGIN: Engine area, running gear, wheel - 83 EQUIP DML: Fixed wiring - 41  
FORM HEAT: Heat from Elect equip; arcing or - 20 MATERIAL TYPE: Polyvinyl (PVC) - 43  
MATERIAL FORM: Electrical wire, cable insulation - 61 METHOD EXT: Makeshift aids - 2  
LEVEL ORIGIN: 3 - 3  
LOSS PROP: 0 LOSS CONT: 0

## SECTION D - COMPLETE FOR STRUCTURE FIRE

STORIES: 0 CONG TYPE: [REDACTED]

EXTENT OF DAMAGE  
FIRE DAM: [REDACTED] SMOKE DAM: [REDACTED]

DET PERC: [REDACTED] SPY PERC: [REDACTED]

TYPE OF MATERIAL GENERATING THE MOST SMOKE  
TYPE MAT: [REDACTED] AVE TRAVEL: [REDACTED]

FORM OF MATERIAL GENERATING THE MOST SMOKE  
FORM MAT: [REDACTED]

EP85-005-LC-0431

NPTF PAGE NO.0002 FDJC EAD2 08-13-1999 14:23

EDID: 04714 INCIDENT: 99005748 Grand Prairie Fire Dept.  
EXP NO.: 000

INC-DATE: 08-01-1999

VERSION: ORIGINAL

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SECTION - E FOR MOBILE PROPERTY INVOLVED

YEAR: 96

MAKE: FORD

MODEL: F150

SERIAL NO.: 1FTEF15YF1L1A1 VEH LIC NO.:TX0Y0140

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FOR EQUIPMENT INVOLVED

YEAR: 96

MAKE: FORD

MODEL: F150

SERIAL NO.: 1FTEF15YF1L1A1



**INVESTIGATIVE CONSULTANTS, INC.**

**CAUSE & ORIGIN REPORT**

ICI FILE # 99-08-0288

CLAIM # [REDACTED]

**PREPARED FOR:**

**STATE FARM INSURANCE COMPANY  
REQUESTOR: TRESA PARKER**

**PREPARED BY:**

**DAVID J. BRISTOW  
FIRE INVESTIGATOR**

All information contained within this report is privileged and confidential. Reports are furnished to our clients only, and release of any and all information contained within them is the sole responsibility of the client.

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**INVESTIGATIVE CONSULTANTS, INC.**  
2205 W. DIVISION, SUITE #G-3  
ARLINGTON, TEXAS 76012  
METRO (817) 469-1848 LOCAL (817) 459-0922

NAME: [REDACTED]  
CLAIM # [REDACTED]  
ICI #: 99-08-0288  
DATE OF LOSS: 8-01-99

TYPE OF INVESTIGATION:  
CAUSE & ORIGIN  
ACCOUNT #: 155  
REPORT DATED: 8-18-99

VEHICLE LOCATION:  
CROSBY ROAD & I-35  
CARROLLTON, TEXAS

REQUESTOR: TRESA PARKER  
PHONE #: (972) 742-2623

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**REQUEST:** The investigation was authorized on 8-03-99 by Ms. Tresa Parker, a claims representative with State Farm Insurance. The purpose of this investigation was to determine the cause and origin of a fire that occurred on 8-01-99 in a 1996 Ford, F-150, pickup.

**ENCLOSURES:**

1. Copy of Recall Information from the NHTSA
2. Photographic Documentation

**PERSONS CONTACTED:**

1. [REDACTED] - The Insured

**PROPERTY DESCRIPTION:** The insured property consisted of a 1996 Ford, F-150, pickup. At the time of the fire scene examination, the vehicle was bearing Texas license plate number NY0-140. The VIN, located on the driver's side door post was 1FTEF15Y5TL [REDACTED]

**VEHICLE EXAMINATION:** The vehicle examination commenced on 8-04-99 at approximately 10:00 a.m. The investigation was conducted at the Lee Jarron Ford Motor Dealership, located at Crosby Road & I-35 in Carrollton, Texas.

An exterior examination of the vehicle revealed only one small area of fire damage to the painted surfaces of the vehicle. This area encompassed the left rear portion of the hood adjacent to the windshield. The remainder of the painted surfaces as well as the lights, lenses and chrome components of the vehicle were in good condition. An inspection of the window glass revealed no evidence of heat fracturing and no indications that flames had extended through any of the windows. The front windshield



NAME: [REDACTED]  
CLAIM #: [REDACTED]

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was slightly sooted but most of the soot was on the exterior of the window glass. The tires and wheels were examined finding all of them to be inflated and no fire damage was noted. The cargo area, as shown in photograph #5, was in good condition and no evidence of fire damage was noted.

An inspection of the undercarriage of the vehicle revealed no obvious areas of concentrated heat deterioration to the main frame or to the front suspension. However, there was some melted plastic that had fallen from the upper left rear portion of the engine compartment and adhered to some of the lower components of the engine.

An inspection of the passenger compartment revealed no indications that flames had extended through the fire wall area into the passenger compartment. As shown in photograph #7, the upholstery as well as the instrument panel area was not severely sooted nor was there any damage noted as a result of the fire. During the examination of the instrument panel area there was no evidence of electrical faulting in the instrument panel wiring nor any indications that internal overheating of the wiring had occurred.

While inspecting the fuse block assembly, one 15 amp fuse (fuse #8) on the fuse block was found to be in the BLOWN position. This particular fuse protected some lighting circuits in the engine compartment, as well as the passenger compartment.

An examination of the engine compartment revealed the area of most fire damage had occurred in the left rear portion of the engine compartment. As shown in photograph #10, the fire damage to the underside of the hood area was concentrated in the general vicinity of where the brake fluid reservoir was positioned. A large area of the painted surfaces of the underside of the hood was consumed and the metal had begun to oxidize. The rubber seal around the rear portion of the hood was also combusted, however, the flame extension was minimal throughout this area. The remainder of the belts, hoses and combustible fluids within the engine compartment were in relatively good condition with the exception of those located near the master cylinder brake fluid reservoir.

An inspection of the electrical circuitry revealed the battery was in relatively good condition as well as the battery cables. As shown in photograph #14, there was no evidence of arcing in the battery cable connections in either the positive or negative terminal connections. During the examination of the wiring harness throughout the engine compartment the majority of damage was confined to the left rear portion of the engine compartment. The wiring harness in the right side as well as the right rear portion of the engine compartment was in relatively good condition with only slight melting to the wiring loom. The power distribution center, as shown in photograph #15, was examined finding the casing was melted and a portion of the cover to the power distribution box had adhered to some of the fuses. The melted plastic was removed and

NAME: [REDACTED]  
CLAIM # [REDACTED]

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the fuses were examined. The examination of the fuses revealed that two fuses were found to be in the BLOWN position. There was a 60 amp fuse and a 30 amp fuse, as shown in photograph #16, that were OPEN. Due to the fact that the fuse identification plate for the power distribution box was melted, no determination could be made as to the specific components that these two fuses protected.

An inspection of the fuel rail assembly revealed some slight damage to some rubber vacuum hoses, especially on the left side of the engine compartment. However, the remainder of the fuel system was in relatively good condition. The air filter assembly housing and vent tube were slightly melted and the burn patterns indicated that the flames had extended from near the area of the brake fluid reservoir. As shown in photographs #17 and #18, the entire plastic container of the brake fluid reservoir was melted and the contents were consumed in the fire. The burn patterns noted within this area indicated that the fire had originated within this general area.

While examining this particular area, as shown in photographs #18 and #19, the brake pressure switch mounted to the master cylinder was fire damaged and there was evidence of some internal heating in the stab blade connections of the brake pressure switch cover cap. An examination of the two remaining stab blade connections for the brake pressure switch cover cap was conducted finding one of the male stab blade connections had electrically faulted and burned in two, as shown in photographs #22 and #23. The two stranded wire conductors supplying power to the brake pressure switch, as shown in photograph #22, also exhibited evidence of electrical faulting on one of the conductors.

The brake pressure switch wiring was examined as it was routed from the brake pressure switch and entered into the main wiring harness. The burn patterns indicated that an electrical fault had occurred in the brake pressure switch and as the wiring faulted within the main trunk of the wiring harness it melted the insulation from other conductors and other electrical faults had occurred. The wiring bundle was partially separated to expose the various electrical faulting. After separating some of the wiring, the two stranded wire conductors routed to the brake pressure switch was found to have had another area of faulting that would have been in the main trunk of the wiring harness. As shown in photograph #27, some of the stranded wire conductor to the brake pressure switch had electrically faulted and melted in two. As shown in photographs #28 and #29, a large section of stranded wire conductors had electrically faulted and melted into some of the other circuitry in the main section of the wiring harness. The burn patterns and combustion effects noted within this area indicated that as the failure occurred in the brake pressure switch and as the insulation was consumed on the two conductors it also ignited the wiring loom and insulation of the main wiring harness. This would also energize the other circuits and allow the electrical faulting in the other circuits to occur.

NAME: [REDACTED]  
CLAIM # [REDACTED]

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The brake pressure switch was well secured, as well as one of the stab blade connections was still attached to the brake pressure switch. These components were not removed in order for Ford Motor Company to have an opportunity to examine the vehicle as it would have been found in its post fire condition. However, one of the stab blade connections that was loose, was removed, photographed and placed back into the pressure switch cap. These components were then sealed in a plastic bag.

During the course of the examination, the engine oil level was examined finding it to be slightly over full. However, it would not be to the extent that it would damage the engine. The oil appeared to be relatively clean.

During the course of the investigation, interviews were conducted with the insured [REDACTED]. [REDACTED] relayed the following information that on Friday afternoon, July 30, 1999, he parked the vehicle at approximately 6:30 p.m. He stated that the vehicle was not driven nor had anyone been in the vehicle until the fire was discovered at approximately 10:30 to 11:00 a.m. on 8-01-99. [REDACTED] stated that he and his granddaughter were in his residence playing cards when a neighbor came to his house and told him that his vehicle was on fire. [REDACTED] stated that he went outside and saw smoke emitting from the engine compartment area. He stated he went to the vehicle and could see the main body of smoke was concentrated in the left rear portion of the engine. During the excitement of the fire, he had forgotten the keys to the vehicle and sent his granddaughter into the residence to recover them. During the time that he was waiting for his granddaughter to bring the keys [REDACTED] stated that he heard the starter engage and the vehicle began to move due to the fact that it was in gear.

[REDACTED] stated that he had some bricks lying close to the house and began to put the bricks under the tires to stop the vehicle from running into his garage door. He stated that neither he nor his neighbor, in their initial discovery of the fire, had noted that the starter was engaged prior to [REDACTED] coming outside.

[REDACTED] stated that after receiving the keys from his granddaughter, he unlocked the vehicle and activated the emergency parking brake and the vehicle stopped. [REDACTED] stated that when he pulled the hood latch, and opened the hood, he noticed that the fire was confined around the area of the brake fluid reservoir, and the plastic brake fluid reservoir had already melted prior to opening the hood. [REDACTED] stated he then used a garden hose and extinguished the fire prior to the fire department arriving.

During the course of the interview, I asked [REDACTED] if he had any recent maintenance conducted on the vehicle. [REDACTED] stated that he had not, other than an oil and oil filter change approximately 1 month prior to the fire. He stated approximately 4 months ago he had an exterior sensor plate replaced in the top part of the engine compartment.

NAME: [REDACTED]  
CLAIM: [REDACTED]

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however, this was not involved in the fire. Mr. Pruitt stated that he has had no maintenance performed on the brake system since he has owned the vehicle. He stated that the last time that he had driven the vehicle, on 7-30-99, that the vehicle had been operating properly with the exception of an engine check light that was on. [REDACTED] stated that the engine check light had been on for sometime and he had it examined at a dealership and they advised him that this check light was some type of oxygen sensor in the exhaust system and there was nothing major with the engine. [REDACTED] stated that at that time he was not going to have the sensor replaced in the exhaust system.

**CONCLUSION:** In conclusion, it is my opinion that this fire event originated within the left rear portion of the engine compartment. Furthermore, it is my opinion that this fire was the result of an electrical failure occurring in the brake pressure switch or the wiring to the brake pressure switch. As the electrical faulting occurred within the wiring to the brake pressure switch it ignited the insulation of the conductors as well as igniting the main portion of the wiring harness. As of this report date, the brake pressure switch has not been disassembled to examine the interior components of the brake pressure switch cover cap.

**INVESTIGATION CONDUCTED BY:**

David J. Bristow  
Fire Investigator

DJB/wm

**PRUITT, WILLIAM**  
**ICI FILE #99-08-0288**

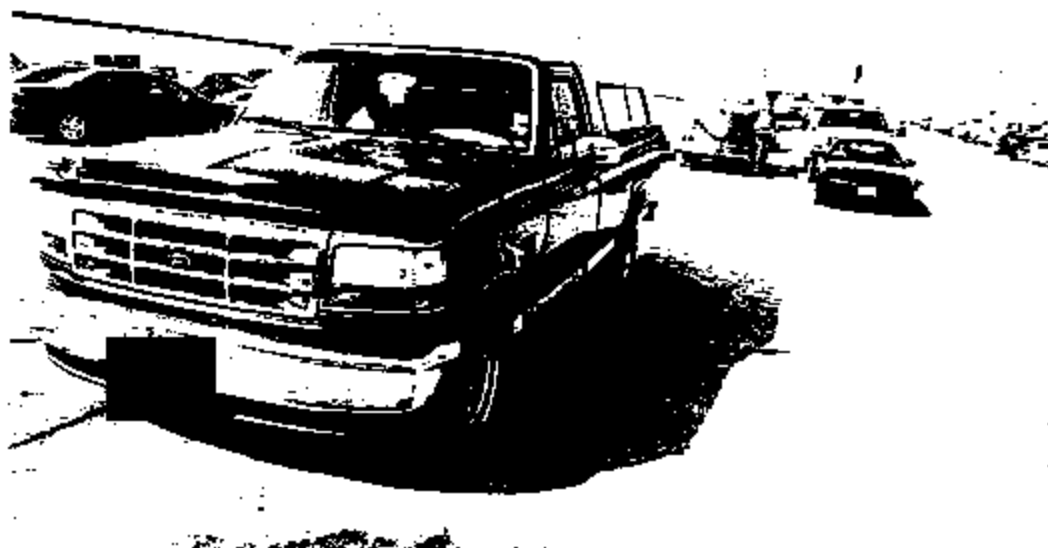
**PHOTOGRAPH DOCUMENTATION**

**EA65-665-LC-B439**

**PHOTO #1:** Shows an exterior view of the left rear portion of the vehicle. Note the only painted surfaces of the vehicle that was damage was in the left rear portion of the hood.

**PHOTO #2:** Shows a view of the VIN plate located on the driver's side door post.

#1



#2

12/URB 1723RB  
 P235/75R15XL TIRES P235/75R15XL  
 15X7.5J RIMS 15X7.5J  
 AT 35 PSI COLD AT 41 PSI COLD  
 THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR  
 VEHICLE SAFETY STANDARDS IN EFFECT ON THE DATE OF  
 MANUFACTURE SHOWN ABOVE.

VIN: 1FTEF15Y5TL

TYPE: TRUCK

5100  
1049PS TS  
EXTERIOR PAINT COLORS

AB	BRK	BODY	TRANS	AXLE	TYPE	STAMP
133	B	764	M	19	5	1049

**PHOTO #3:** Shows an exterior view of the left rear portion of the vehicle.

**PHOTO #4:** Shows an exterior view of the right rear portion of the vehicle. Note there was no fire damage noted in this area.



#3



#4

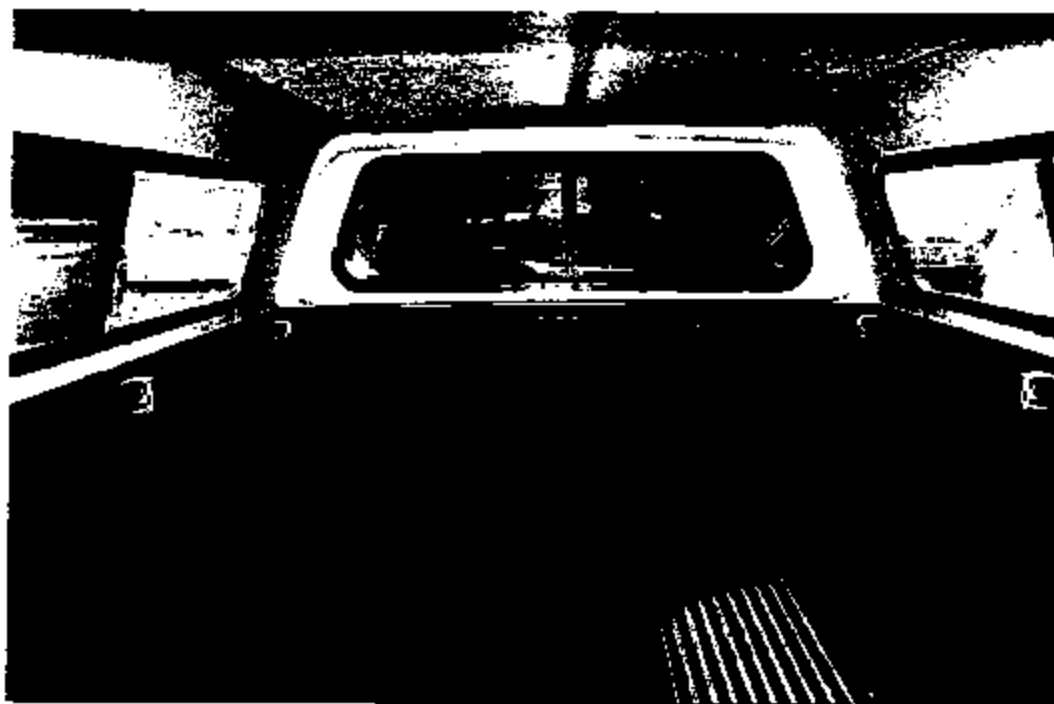


ER85-885-LC-8443

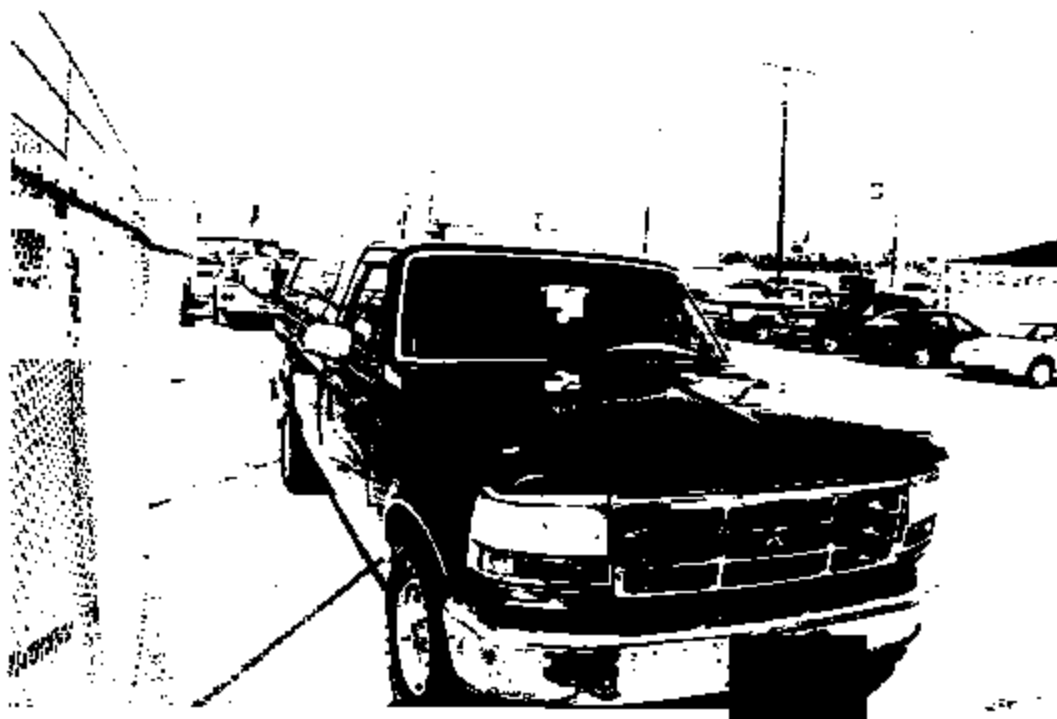
**PHOTO #5:** Shows a view of the cargo area. Note there was no fire damage noted and no evidence of heavy sooting.

**PHOTO #6:** Shows a view of the right front portion of the vehicle.

#5



#6



EA85-005-LC-0445

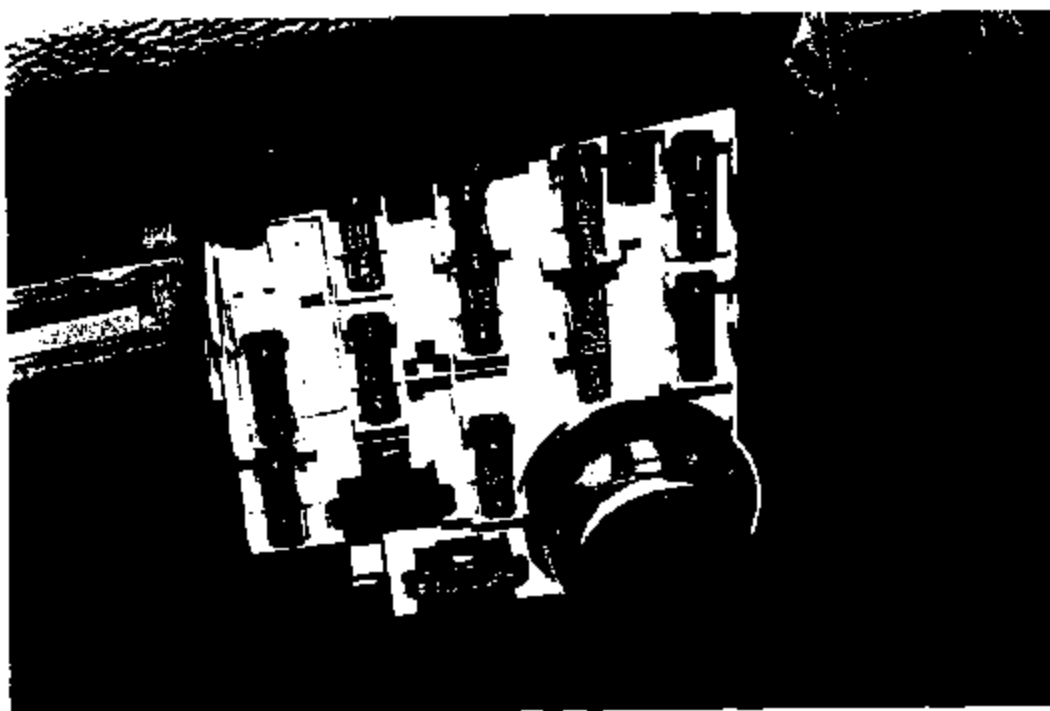
**PHOTO #7:** Shows a view of the passenger compartment taken from the left side of the vehicle. Note there were no indications that flames had extended through the fire wall area.

**PHOTO #8:** Shows a view of the fuse block assembly during the examination. Note the 15 amp fuse, #8 was found to be in the BLOWN position.

#7



#8



ER25-005-LC-0447

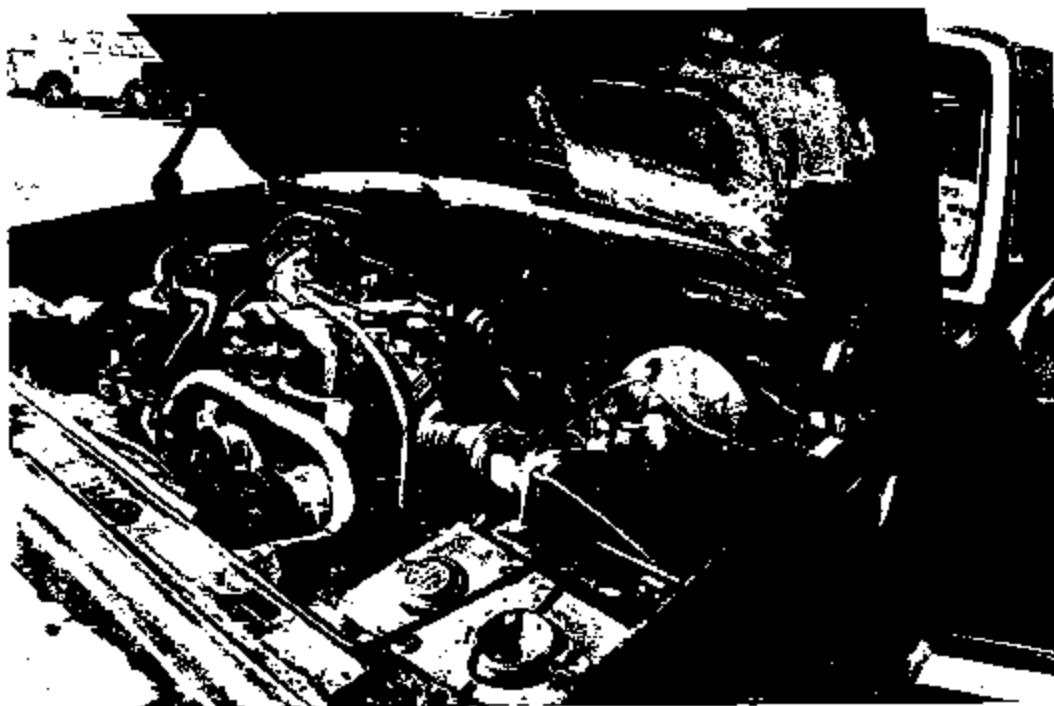
**PHOTO #9:** Shows a view of the passenger compartment taken from the right side of the vehicle. Note there were no indications of fire damage to the instrument panel area or windshield.

**PHOTO #10:** Shows a view of the left side of the engine compartment. Note in this photograph the combustion to the paint of the underside of the hood, as well as the combustion of the insulation wiring to the engine courtesy lamp. Note there were no fault conditions noted to the wiring to the courtesy lamp.

#9



#10



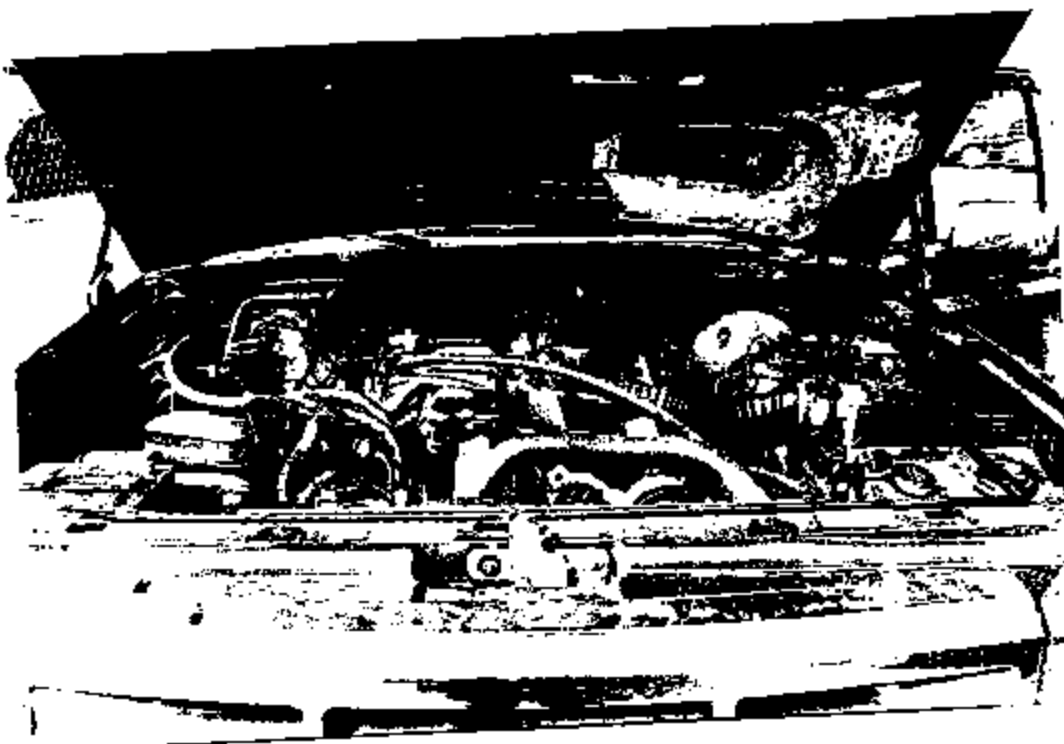
ER95-005-LC-0440

**PHOTO #11:** Shows a frontal view of the engine compartment which shows the main area of fire damage was in the left rear. Note there was a slight amount of heat extension across the top of the engine.

**PHOTO #12:** Shows a view of the right side of the engine compartment. Note most of the hoses and belts in this area were in relatively good condition.



#11



#12



**PHOTO #13:** Shows a view of the battery and alternator. Note the alternator wiring was in good condition and no evidence of overheating was noted. Note the battery casing was not severely fire damaged.

**PHOTO #14:** Shows a view of the positive and negative battery terminal connections. Note there was no evidence of electrical faulting in either connection.

#13



#14



EA85-085-LC-0453